# Certified Mail-Return Receipt Requested

Ohio Environmental Protection Agency Solid and Hazardous Waste Management Post Office Box 1049 Columbus, Ohio 43266 Attn: Mr. Thomas Crepeau

U.S. Environmental Protection Agency Region V Post Office Box A 3587 Chicago, Illinois 60604 Attn: RCRA Activities



Re: Withdrawal of Part A RCRA Permit Application
LTV Steel Company, Inc.

Cleveland (East) Works 3100 East 45th Street Cleveland, Ohio 44127

U.S. EPA ID No. OHD 004 218 673 6 TR, 13 (HWFAB #02-18-0186)

U.S. EPA, REGION V

#### Dear Readers:

Confirming previous verbal conversations, we are herewith submitting all required documentation to allow LTV Steel to withdraw the RCRA Part A permit for the Cleveland Works. This information also is submitted in response to Ohio EPA's letter of March 6, 1986 dealing with closure of tanks, and conforms to recent U.S. EPA letters regarding EPA Policy 121 for closure in place of tanks reverting to less than 90 day storage.

In conformance with a suggestion from Mr. Bill Muno of Region V of U.S. EPA, this submittal is in three parts:

- 1. Corrected of Part A to reflect current practice and regulations.
- 2. Closure in place of less than 90 day storage tanks.
- 3. Full closure of tanks no longer in use.

Certification statements, as required by 40 CFR 270.11, have been signed by W. G. Wiley, Vice President Flat Rolled, addressing the above information.

LTV Steel wishes to withdraw the subject Part A application and terminate its status as a hazardous waste storage facility. The Cleveland (East) Works wishes to continue to maintain its status as a generator of hazardous waste.

# 1. Corrected Part A

Republic Steel submitted the first application for a Part A permit on November 17, 1980 which was subsequently revised prior to entry into the

Hazardous Waste Facility Approval Board (HWFAB) Journal on December 28, 1981. Enclosed is Attachment 1-A which is the HWFAB permit.

Process Design Capacities listed were:

SO2 - 158,460 Gallons

Attached (1-B) is a listing of the SO2 storage facilities identified in the HWFAB permit.

On July 26, 1982, Republic Steel revised and corrected the Part A application to reflect regulatory and operational changes at the Cleveland Works. The application was resubmitted to the Hazardous Waste Facility Approval Board, the Ohio EPA and the U.S. EPA (Region V). On March 27, 1985, the Ohio EPA returned the July 26, 1982 reapplication explaining that there were no rules by which to process requests for permit changes. The letter from Ohio EPA is shown as attachment 1-C. In addition, no action was taken by any agency on the modification request because of the significant amount of time that had passed since the request was submitted. The Ohio EPA indicated that it was now in a position to consider a modification request and suggested that an updated permit change package be resubmitted should we still wish to pursue a change to the permit. The requested permit changes were never processed and the permit remains as originally issued.

The attached Part A application (2-A, 2-B, 2-C) dated April 28, 1986 has again been corrected by LTV Steel to reflect recent regulatory and operational changes at the Cleveland Works. Of the 158,460 gallons of storage allowed by the original application, the following amounts have been eliminated for the reasons listed:

Desulfurization Tanks	18,690	Desulfurization liquor not hazardous
	410	Desulfurization liquor not hazardous
Coal Tar Sludge Mill Tank	3,070	Recycled material (Closed Loop)
Dumpsters (coal tar sludge	4,761	Recycled material (Closed loop)
and tar material)	· · · · · · · · · · · · · · · · · · ·	
	26,931	Gallons (TOTAL)

Additionally, the following item has been added to the total storage capacity:

60" Electro-Plate Acid Tank	15,000	Converted to Spent Pickle Liquor
		storage

This leaves a total of (158,460-26,931+15,000=) 146,529 gallons storage. This is the total amount enumerated on the attached Part A application. Also, note the name change from Republic Steel Corporation to LTV Steel Company, Inc.

# 2. Closure in place (less than 90 day storage)

The five storage tanks containing hazardous wastes listed in Attachment 3-A will be emptied within every 90 day period. Closure of these tanks falls under EPA Policy 121 guidelines and the required certifications are included

as Attachments 3-B and 3-C. The total amount of storage for these tanks is 71,529 gallons. Waste management procedures to assure compliance with the less than 90 day storage period are described as Attachment 3-D. The agencies' review and approval of the procedure is requested for these five storage tanks.

# Full closure of storage tank

The three storage tanks at the 98" Pickle Line are no longer used for storage of spent pickle liquor. The appropriate closure documents are attached and listed as Attachments 4-A through 4-C. The total amount of storage for these tanks is 75,000 gallons. The agencies' review and approval of the closure plan is requested for these three storage tanks.

The description above accounts for all of the storage volume and hazardous wastes listed on the original HWFAB permit. Should you have any question regarding the withdrawal of the Cleveland (East) Works Part A application, please contact Mr. Larry Szuhay at (216) 429-6475.

Thank you for your consideration.

Very truly yours,

W. G. Wiley, Jr.

W. G. Wila

Vice President Flat Rolled

WGW/SH/fh

Attachments

cc: Kris Coder, Ohio EPA-Twinsburg

1818a

bcc: J. F. Bush

T. M. Girdler

S. Hansen

L. E. Larson

R. L. Nemeth (w/attachments)

S. Rihtar

L. A. Szuhay J. V. Stack (w/attachments)

W. L. West

T. A. Zalenski

Withdrawal of Part A RCRA Permit Application LTV Steel Company, Inc. Cleveland (East) Works 3100 East 45th Street Cleveland, Ohio 44127 U.S. EPA ID No. OHD 004 218 673 (HWFAB #02-18-0186)

# ATTACHMENTS

# 1. Background Information

- 1-A Approved HWFAB Permit dated December 28, 1981
- 1-B SO2 storage facilities December 1981
- 1-C Letter from Ohio EPA dated March 27, 1985

# 2. Corrected Part A

- 2-A Part A Application dated April 28, 1986 Form 1 Form 3
- 2-B Facility Drawing and Topographic Map
- 2-C Facility Photographs
  - 1. 3 Spent Pickle Liquor Storage Tanks (98")
  - 2. 2 Spent Pickle Liquor Storage Tanks (84")
  - 3. 2 Spent Pickle Liquor Storage Tanks (Electro Plate)
  - 4. 1 Degreaser Sludge Storage Container (Electric Shop)

# 3. Closure in place (less than 90 day storage)

- 3-A Hazardous Waste Storage Tanks (April 1986)
- 3-B Container/Storage Closure Request (EPA Policy 121)
- 3-C Spill Certification Statement
- 3-D Hazardous Waste Management Procedures

# 4. Full closure of storage tank

- 4-A Tank Closure Plan dated April 28, 1986
- 4-B Facility Drawing
- 4-C Detailed Drawings

Foundation Location Tank Detail (typical)

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

Installation's EPA ID Number A. First Notification B. Subsequent Notification (complete item C) 3 0 0 8 6 Η

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March 27, 1987

U. S. EPA Region V RCRA Activities Waste Management Division Post Office Box A-3587 Chicago, Illinois 60690

Subject: Notification of Hazardous Waste Activity

Installation Name Change

### Gentlemen:

Enclosed please find completed EPA Form 8700-12, Notification of Hazardous Waste Activity, reflecting installation name change for the formerly named Republic Steel, Cleveland District to LTV Steel Company, Inc., Cleveland Works-East.

It is presumed that the installation EPA ID number, i.e., OHD 004218673, remains valid since only the name of the installation has been changed.

If there are any questions on this matter, please contact the undersigned.

J. M. Potwora

Environmental Management Engineer

Environmental Control

JMP/fh

Attachment

cc: Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
Technical Assistance and Waste Management Section
Post Office Box 1049

Columbus, Ohio 43266-1049 Attn: Ms. Karen Knudtsen

2841a

REGELVE

APR - 1 1987

U.S. EPA, REGION V



# **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 5 RCRA ACTIVITIES** P.O. BOX A3587 CHICAGO, ILLINOIS 60690

RCRA ACTIVITIES

5-15-89

OHD004218673

In response to your request of  $\frac{4-1-87}{\text{tollowing information has been updated on your notification:}}$ 

Waste activity repetated to include off-Specification used oil. Name Charged to LTV Steel. Waste Codes added. Installation Contact Charges

Only your notification form has been revised. According to our records your company notified as a treater/storer/disposer (TSD) facility. Pursuant to 40 CFR Part 270.72 (or equivalent State regulations), you must submit a revised Part A permit application prior to changes in ownership or operational control. If you have ceased your TSD activities, you must go through closure pursuant to 40 CFR Part 264/265 Subpart G (or equivalent State regulations). If you have never operated as a TSD facility, you must withdraw your Part A permit application. If you are located in the authorized States of Illinois, Indiana, Michigan, Minnesota, or Wisconsin, you must comply with the States' equivalent to the above referenced Federal rules. You must also submit the necessary documentation to the State contacts on the attached list.

Please contact the appropriate State agency on the enclosure for further information. If your facility is located in Ohio, contact Mr. George Hamper of the U.S. Environmental Protection Agency's Ohio Technical Section at (312) 353-4789.

Failure to act on this is a serious violation and may subject you to Federal or State enforcement actions under Section 3008 of the Resource Conservation and Recovery Act (or equivalent State authority). If you have any questions concerning this letter contact Ms. Sharon Kiddon at (312) 886-6173.

Sincerely,

Arthur S. Kawatachi, Chief

Information Section

RCRA Program Management Branch

Enclosure

State Agency

Part A File



# ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

OHD004218673 REACKNOWLEDGEMENT

REPUBLIC STEEL CORP CLEVELAND DIST
3100 EAST 45TH STREET
CLEVELAND OH 44127

INSTALLATION ADDRESS 3100 EAST 45TH STREET
CLEVELAND OH 44127

EPA Form 8700-12B (4-80)

09/29/81

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

B. SUBSEQUENT NOTIFICATION (complete item C)

D. WATER

C. HIGHWAY

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

A. FIRST NOTIFICATION

Please go to the reverse of this form and provide the requested information.

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E. OTHER (specify):

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EPA Form 8700-12 (6-80) REVERSE

I.D. - FOR OFFICIAL USE ONLY



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

# 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HE-12

APR 3 1987

L. Aguier Republic Steel Corp. (Cleveland Dist) 3100 E. 45th St. Cleveland, OH 44127

EPA ID Number: OHD-004-218-673

Re: Requirements for Generators, Marketers and Burners of Hazardous Waste and Used Oil Fuels

Dear L. Aguier:

This letter acknowledges that the United States Environmental Protection Agency (U.S. EPA) has received your Notification of Hazardous Waste Activity as required by the new Waste-As-Fuel regulations. These regulations were published in the November 29, 1985, Federal Register and apply to persons who generate, market, transport, or burn hazardous waste fuel or used oil fuel.

The following information highlights the administrative requirements for persons subject to the current Waste-As-Fuel regulations promulgated on November 29, 1985, in 40 CFR (Code of Federal Regulations) Part 266, Subparts D and E.

# **GENERATORS**

Persons Generating Hazardous Waste Fuel. Generators that send their hazardous waste to a hazardous waste fuel marketer are subject to the 40 CFR Part 262 generator standards [see 40 CFR 266.32(a)]. Generators that market their hazardous waste fuel directly to burners are subject to both the 40 CFR Part 262 standards and the hazardous waste fuel marketer requirements [see 40 CFR 266.32(b)]. Generators that are burners are also subject to 40 CFR 266.35.

Persons Generating Used Oil Fuel. Used oil generators are exempt from the current Waste-As-Fuel regulations unless they: (1) market off-specification used oil fuel directly to a burner, or (2) burn off-specification used oil for energy recovery. Generators marketing directly to a burner are subject to 40 CFR 266.43. Generators burning off-specification used oil fuel are subject to 40 CFR 266.44.

#### **MARKETERS**

Persons Marketing Hazardous Waste Fuel. Persons who market hazardous waste fuel include the following: (1) generators marketing hazardous waste fuel directly to a burner, (2) persons who receive hazardous waste from generators and produce, process, or blend hazardous waste fuel, and (3) persons who distribute but do not process or blend hazardous waste fuel. Hazardous waste fuel marketers are required to have notified U.S. EPA of their hazardous waste fuel activities, have a U.S. EPA Identification Number, and market only to persons who have notified U.S. EPA and who burn the fuel only in industrial furnaces, industrial boilers, or utility boilers. These marketers are also required to comply with manifest requirements, certification of compliance with burning standards, recordkeeping requirements, and storage standards [see 40 CFR 266.34].

<u>Persons Marketing Used Oil Fuel.</u> 40 CFR 266.43 describes to whom the regulations for used oil marketing apply. The same requirements for persons marketing hazardous waste fuel apply to off-specification used oil fuel marketers, except for the manifest and storage requirements [see 40 CFR 266.43].

## TRANSPORTERS

Persons Transporting Hazardous Waste Fuel. Persons who transport hazardous waste fuel are subject to the 40 CFR Part 263 standards for hazardous waste transporters. These persons are required to notify U.S. EPA of their Waste-As-Fuel activities. However, they are not required to renotify U.S. EPA of their hazardous waste transportation activities if they have already done so.

<u>Persons Transporting Used Oil Fuel.</u> Persons who transport used oil fuel, both onspecification and off-specification, are currently exempt from the Waste-As-Fuel regulations.

### **BURNERS**

Persons Burning Hazardous Waste Fuel. Owners and Operators of industrial furnaces, industrial boilers and utility boilers that burn hazardous waste fuel are subject to the following: (1) notification to U.S. EPA of hazardous waste fuel activities, (2) manifest requirements, (3) certification with burner standards, (4) recordkeeping requirements, and (5) storage standards. Burners must also comply with the prohibitions on use in non-industrial boilers [see 40 CFR 266.35].

Persons Burning Used Oil Fuel. Owners and Operators of industrial furnaces, industrial boilers and utility boilers are subject to the same requirements as Hazardous Waste Fuel Burners except for the manifest and storage standards [see 40 CFR 266.47].

If you have any questions concerning this letter or the Waste-As-Fuel regulations, please contact either Ms. Shirlee Brauer at (312) 886-4591, or Ms. Laura Lodisio at (312) 886-7090 or the RCRA/Superfund Hotline at (800) 424-9436.

Sincerely,

Basil G. Constantelos, Director Waste Management Division

Enclosure

FORM	-		
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U.S. IRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION

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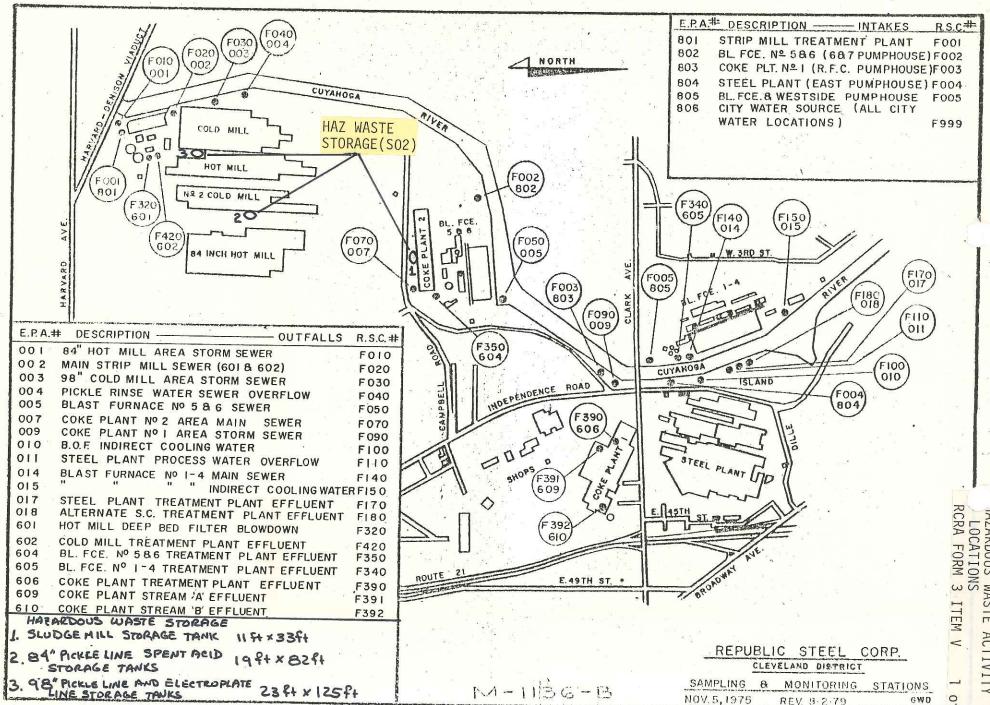
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Continued from page 2, NOTE: Photocopy this page before completing if  $\gamma_s$  ve more than 26 wastes to list.

	PA	מיו	N.	UMI	BER (enter from page 1)	\	/ /	<u> </u>				F	OR	OF	FICIA	AL US	SE O	DNLY TAGE
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1	F	0	0	26	35		36. T	27 S	0	29	27	- 29	2	<del>7 -</del>		27 -	29	Recycled on coal to coke battery using Sludge Mill
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Ī	IV. DESCRIPTION OF HAZARDOUS WASTES (con	inued)								
Γ	E. USE THIS SPACE TO LIST ADDITIONAL PROC	ESS CODES FROM	ITEM D(1) ON PAGE 3	•						
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ŀ	FOHDO042186736									
ŀ	V. FACILITY DRAWING		in the second second	10 mg 12 mg 150		12 4,50	n Service	0-010	159276	
ŀ	All existing facilities must include in the space provided on p	age 5 a scale drawing o	of the facility (see instruction	ns for more d	etail).				************	9686B
ŀ	VI. PHOTOGRAPHS				( e	1	10.75 E	1,5	STEE ST	
ł	All existing facilities must include photographs (aeria	al or ground—level) i	rhat clearly delineate all	existing stru	ctures	: exist	ing sto	rage,		
	treatment and disposal areas; and sites of future stor	age, treatment or dis	sposal areas (see instruct.	ions for mor	e deta	il).				
Ì	VII. FACILITY GEOGRAPHIC LOCATION	a de la companya de			+			ار تاریک	- j. j. j.	á
ŀ	LATITUDE (degrees, minutes, & seconds)		LONGITU	DE (degrees, 1	ninutes	, & sec	onds)			
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I	VIII. FACILITY OWNER	3,3,4,5,600								
ı	A. If the facility owner is also the facility operator as I	isted in Section VIII or	n Form 1, "General Informa	tion", place a	n "X"	in the b	ox to t	he left	t and	
۱	skip to Section IX below.	•								
ł	B. If the facility owner is not the facility operator as li	sted in Section VIII on	Form 1, complete the following	owing items:			•			
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	IX. OWNER CERTIFICATION	43 7 3 7 8			13. j. s.	\$14£ 8		100		
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Ì	documents and that hased on my inquiry of those it	ndividuals immediati	elv responsible for obtail	ning the into	rmati	מו, חס	eneve	tnat t	ine.	
	submitted information is true, accurate, and comple	te. I am aware that t	here are significant pena	ilties for sub	mittin	g talse	intori	natioi	n,	
	including the possibility of fine and imprisonment.									
	A. NAME (print or type)	B. SIGNATURE	A		C. DAT	ESIGN	(ED			
	P. N. Wigton, Vice President	1 2mm	Li fi		~ 1	2,	and the same of th	10	·	
	Steel Operations	1-1/19/1	MART			ا مست				
	X, OPERATOR CERTIFICATION		$(\operatorname{constant}_{\mathcal{A},\mathcal{A}}) \to (\mathfrak{b},\mathfrak{a}) \times (\operatorname{constant}_{\mathcal{A},\mathcal{A}})$			di di			(Artista)	
	I certify under penalty of law that I have personally	examined and am fa	amiliar with the information	tion submitt	ed in t	his an	d all a	ttache	ed	
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AZARDOUS WASTE ACTIVITY

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A D	II. PROCESSES — CODES AND DESIGN CAPACITIES																
	PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then																
				process (includin													
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				ESIGN CAPACIT T — Enter the arr		açn çode ente	rea in colu	mn A ent	er the ca	pacity	or u	ie process.					l
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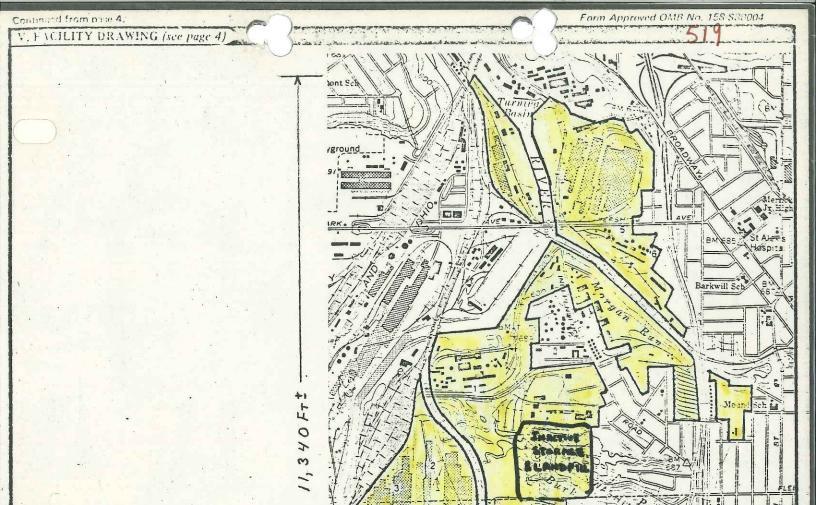
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	1	A. EPA					C. UNIT		L	D. PROCESSES											
LINE NO.	HAZARD. WASTENO (enter code)		10	QUANTITY OF WASTE		OF MEA- SURE (enter code)			1. PROCESS CODES (enter)										2. PROCESS DESCRIPTION (if a code is not entered in $D(1)$ )		
X-1	1	K	0	5	4	900	-	P		T	0	3	D	8	0		I	1 "	1	1	,
X-2	2	p	0	0	2	400		P		T	0	3	D	8	0		1	į	7		
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X-⁄	1	D	0	0	2						1	1		-	ļ		1	1	1	1	included with above

Continued from page 2. NOTE: Photocopy this page before completing if you are more than 26 wastes to list. Form Approved OMB No. 158-S80004 EPA I.D. NUMBER (enter from page 1) FOR OFFICIAL USE ONLY  $\vec{\mathbf{w}}$ 10 0 8 6 3 w DUP DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA-SURE (enter code) A. EPA HAZARD. WASTE NO D. PROCESSES B. ESTIMATED ANNUAL QUANTITY OF WASTE Z O 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) (enter code) 29 27 36 23 27 Recycled on coal to coke battery s'0'2 1 Ţ 0 11 U using sludge mill S 0 2 3 T 10 Ю 15 ĮΙ 'n 0 P 11 3 1 290 \$ 0 2 ii. 1) 11 K O 8 7 4,140 T S 0 2 2 0 6 53,500 T S 0 2 K D O 0 2 300 T S 0 1 S 0 2 6 Coke Oven Gas Desulfurization <del>Sludge and Liquor.</del> D |0 0 2 Coke Plant Waste Ammonia Liquor 388,355 T T 0 1 Strip Mill Pickle Rinse Water 8 D 0 0 2 887,230 T T 0 1 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

26

IV. DESCRIPTION OF HAZARDOUS WASTES (conti	inued)			
E. USE THIS SPACE TO LIST ADDITIONAL PROCE	SS CODES FROM ITEM D(1	ON PAGE 3.		
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EPA I.D. NO. (enter from page 1)	-			
5 D H D 0 0 4 2 1 8 6 7 3 7/4 5				
1 2 - 13 14 15				
V. FACILITY DRAWING				
All existing facilities must include in the space provided on p	age 5 a scale drawing of the facility	(see instructions for more	detail).	
VI. PHOTOGRAPHS		and the first property of the		
All existing facilities must include photographs (aeria	or ground—level) that clearly	delineate all existing st	ructures; existii ore detaill	ng storage,
treatment and disposal areas; and sites of future stora	ige, treatment or disposal area	s (see instructions for in-	ne uetali).	
VII. FACILITY GEOGRAPHIC LOCATION				anda)
LATITUDE (degrees, minutes, & seconds)		LONGITUDE (degrees	, minutes, & seco	71(48)
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- 1 SLUDGE MILL 11'x33'=
- 2 84" PICHLER SPENT PICHLE LIQUOR TANNS AREA 19'x 82' ?
- 3 98" PICHLER SPENT PICHLE LIQUOR TANKS AREA 23'x 125':
- 4 PICHLE RINSE WATER NEUTRALIZATION & OXIDATION TANN AREA 68'x19':

JEM 642

8,360 FT=

- 5 COME OVEN GRE DESULFURIZATION:
  DISPOSAL SUMP 12'X9' =

   DRUM STORAGE AREA 21' X 9' =
- 6 CONE PLANT WATER TREATMENT PLANT 182' X 135'

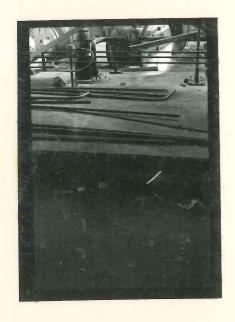
FORM 3 ITEM V (PAGE 1 OF 1)

Newburgh Heights

FORM 3 ITEM VI (PAGE 1083)



SLUDGE MILL STORAGE

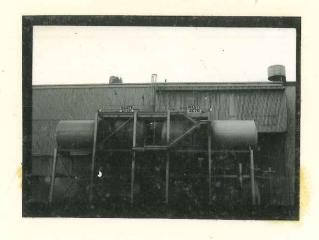


COME OVEN GAS DESULFURIZATION DISPOSAL SUMP

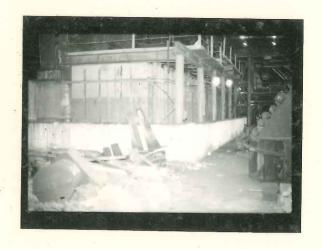


DRUM STORAGE AREA

FORMS ITEM VI (PAGA 2013)



84" PICHLER" SPENT PICHLE



.98" PICHLER SPENT PICHLE LIQUOR STORAGE TANKS



PICHLE RINSE WATER
NEUTRALIZATION AND
OXIDATION TANK



10813F

COME PLANT WATER TRRATMENT FLANT

SECTION VI (PAGE 3003)

# TERMS AND CONDITIONS (General)

- 1. Only those hazardous wastes as identified by the U.S. EPA Hazardous Waste Number(s) set forth in the approved permit application, attached hereto, may be managed at the facility and only pursuant to the specified processes and design capacities indicated and set forth in the approved permit application.
- 2. The Permittee and the facility shall comply with all applicable performance standards adopted by the Director of Environmental Protection pursuant to Division (D) of Section 3734.12 of the Revised Code.
- 3. The Permittee and the facility shall comply with all applicable requirements of Chapter 3734 of the Revised Code, the Ohio Hazardous Waste Rules, and the federal statutes and regulations concerning hazardous waste.
- 4. This permit shall expire three years after its date of issuance. The date of issuance is the date the resolution to issue the permit was passed by the Board.
- 5. This permit, in accordance with the procedures of the Board, may be modified, revoked, or alternatively revoked and reissued, to comply with applicable provisions of Chapter 3734 of the Revised Code or the Ohio Hazardous Waste Rules.
- 6. The annual permit fee, payable to the Treasurer of State, shall be submitted to and received by the Board on or before the anniversaries of the date of issuance, during the term of the permit.
- 7. Unless otherwise specifically provided, all studies, reports, data, plans and other information required to be submitted by this permit shall be transmitted to:

Hazardous Waste Facility Approval Board P.O. Box 1049 361 East Broad Street Columbus, Ohio 43216

The permit number shall be indicated on the transmittal letter.

TERMS AND CONDITIONS (Special)

ACCURATE COPY OF THE OFFICIAL DOCUMENT AS FILED IN THE RECORDS OF THE OHIO HAZARDOUS WASTE FACILITY APPROVAL BOARD

NOT APPLICABLE

HAZARADOUS WASTE FACILITY
APPROVAL BOARD

و الرواد وي

DEC 28 1981

ENTERED BOARD'S JOURNAL

\_ DATE <u>12/31/81</u>

# ATTACHMENT 1-B

# Republic Steel Company Cleveland Plant WASTE STORAGE TANKS

# December 1981

Coal Tar Sludge Mill - #2 Coke Plant	-	gallon	
10 - Recycle Dumpsters	2,290 Mrs 47	_	containers
84" Pickle Line (Spent Hydrochloric Acid)		gallon gallon	
			//
98" Pickle Line (Spent Hydrochloric Acid)		gallon gallon	
	25,000	gallon	tank
60" Electroplate Line (Spent Hydrochloric Acid)	6,000	gallon	tank
Desulfurization of COG (Liquor and Sludges)		gallon gallon	
TOTAL	158,460	gallon	s

# EGEIVEI JAN 05 1982

# ENVIRONMENTAL CONTROLLING BY OPPROVAL . board

James A. Rhodes, Governor Wayne S. Nichols, Chairman

<del>077</del>8073

P.O. Box 1049 361 E. Broad St. Columbus, Ohio 43216 (614)462-6981

Re: Permit No. 02-18-0186

DEC 2 8 1981

Republic Steel Cleveland District 3100 East 45th Street Cleveland, Ohio 44127

Attn: L. Aguier

# Dear Permittee:

Transmitted herewith is a certified copy of your Hazardous Waste Facility Installation and Operation Permit (Permit) as such permit was entered into the Journal of the Board. The permit consists of the following:

- The standardized permit form (Findings and Conclusions and I) Issuance).
- Terms and Conditions as approved by the Board (Special Terms 2) and Conditions applicable to all permittees and Special Terms and Conditions for specific facilities).
- Portions of the approved Part A permit application indicating 3) the approved hazardous waste processes and design capacities and those hazardous wastes, identified by U.S. EPA Hazardous Waste Number, to be managed at the facility.

Processes, design capacities, and/or specific hazardous wastes which are stricken through or crossed out on the Part A permit application are not included in the approved permit. Unless otherwise notified by certified mail and afforded the opportunity for an adjudication hearing before the Board, all such deletions have occurred with the authorization of the applicant or his representative.

You are encouraged to carefully read the permit in its entirety. questions or comments concerning its content should be addressed to:

> Ms. Peggy J. Vince Executive Director Hazardous Waste Facility Approval Board

P.O. Box 1049

361 East Broad Street

CERTIFY THIS COPY TO BE A TRUE AND 14 43216
ACCURATE COPY OF THE OFFICIAL DOCUMENT 614) 462-6981 ACCURATE COPY OF THE OFFICIAL DOCUMENT AS FILED IN THE RECORDS OF THE OHIO

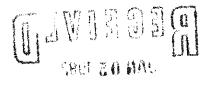
HAZARDOUS WASTE FACILITY APPROVAL BOARD

ENTERED BOARD'S JOURNAL

DATE \_121.31

HAZARADOUS WASTE FACILITY APPROVAL BOARD

DEC 28 1981



Environmental Control Devil.

YOU ARE HEREBY ADVISED THAT: All appeals of these matters are to the Court of Appeals of Franklin County, 369 South High St., Columbus, Ohio 43215, Attn: Deputy Clerk, and shall be pursuant to the provisions of Section 3734.05(C)(7) of the Revised Code.

Sincerely,

Peggy J. Vince

Peggy J. Vince Executive Director

PJV/ss

Enclosure

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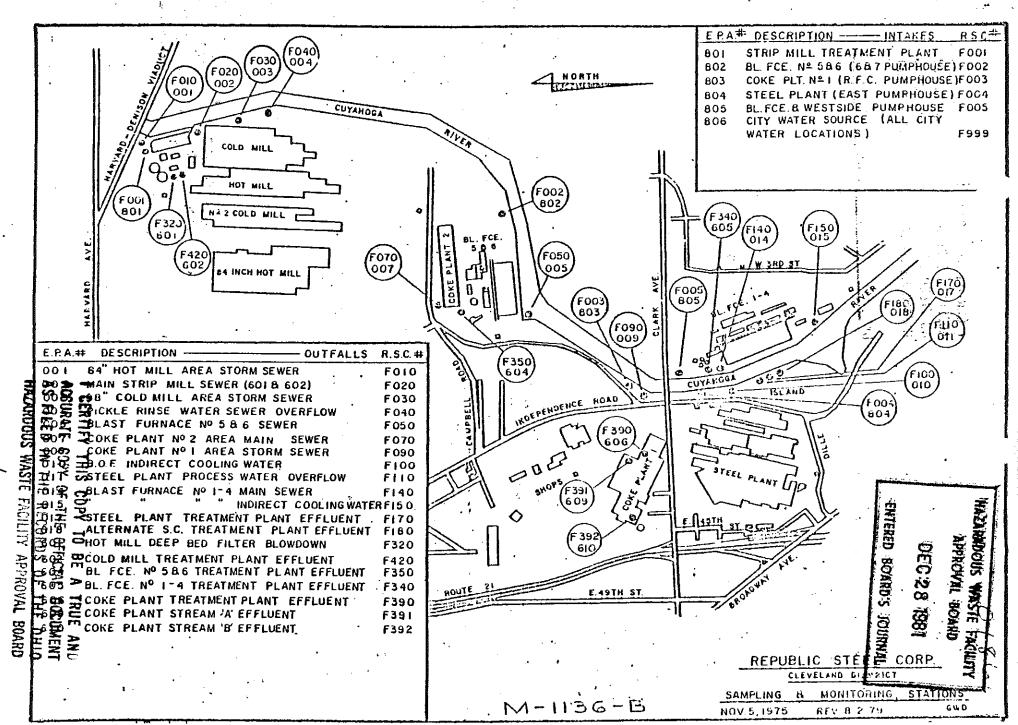
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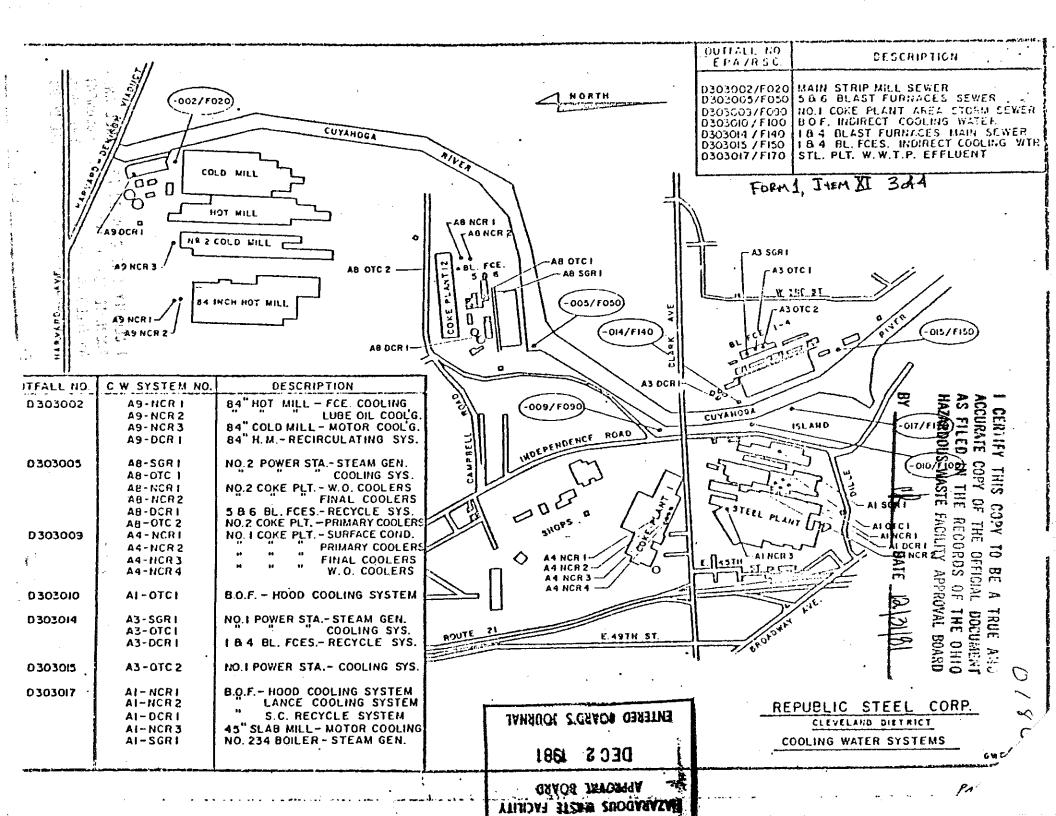
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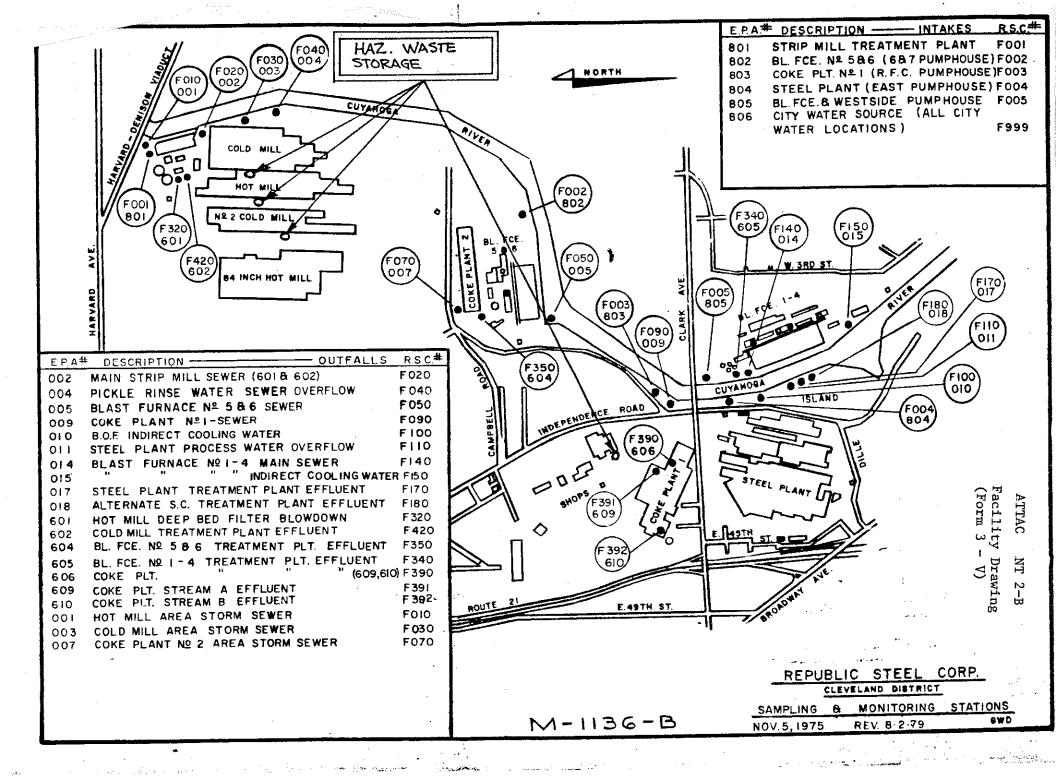
APPROVAL BOARD

DEC 28 1981

ENTERED BOARD'S JOURNAL







EPA Form 3510-1 (6-80)

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7 3, 3, 1, 2 Integrated Steel Plant	7 , , ,	
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VIII. OPERATOR INFORMATION	ME	B. Is the name listed in Item VIII-A also the
<u>e</u>		owner?
BLTV STEEL COMPANY, I	N.C.	YES □ NO
15 16 C. STATUS OF OPERATOR (Enter the appropriate letter into		D. PHONE (area code & no.)
F = FEDERAL M = PUBLIC (other than federal or state)	(specify)	
S = STATE O = OTHER (specify) P = PRIVATE	F 56	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$
E, STREET OR P.O. BOX		
PO BOX 6778		
26 F. CITY OR TOWN	G.STATE H. ZIP COD	E IX. INDIAN LAND
	<del>, , , , , , , , , , , , , , , , , , , </del>	Is the facility located on Indian lands?
BCLEVELAND	<u>, , , , , , , , , , , , , , , , , , , </u>	☐ YES □ NO
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X. EXISTING ENVIRONMENTAL PERMITS  A. NPDES (Discharges to Surface Water)  D. PSD (Air	Emissions from Proposed Sources)	
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B. UIC (Underground Injection of Fluids)	E. OTHER (specify)	ecify)
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43 16 17 18 30 13 16 17 18 C. RCRA (Hazardous Wastes)	E. OTHER (specify)	
	(SI	ecify)
0 R 0 H D 0 0 4 Z I 8 6 7 3 9 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	30	
XI. MAP	tanding to at least one mile beyond r	roperty boundaries. The man must show
Attach to this application a topographic map of the area ex the outline of the facility, the location of each of its exist	ing and proposed intake and dischar	ge structures, each or its nazardous waste 🛴
treatment storage, or disposal facilities, and each well who	ere it injects fluids underground. Inc	lude all springs, rivers and other surface
water bodies in the map area. See instructions for precise rec	quirements,	
XII. NATURE OF BUSINESS (provide a brief description)		
Integrated Steel Plant producing zi	nc coated sheets and coil	; bar products;
hot rolled coil and strip; cold rol		
	ica corr and berry, cone	produces,
and merchant iron.	:	•
		,
		-
XIII. CERTIFICATION (see instructions)		e jangang panggapang panggapan
I certify under penalty of law that I have personally exam	ined and am familiar with the inform	ation submitted in this application and all
attachments and that, based on my inquiry of those per application, I believe that the information is true, accurat	rsons immediately responsible for ob	otaining the information contained in the 🐇
false information, Including the possibility of fine and impl	risonment.	
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Vice President	4)641	1 4/24/4.2
W. G. Wiley, Jr. Flat Rolled  COMMENTS FOR OFFICIAL USE ONLY		
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III. PROCESSES (continued)	
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c. space for additional process codes or for describing other processes (code "T04"). For each process entered here include design capacity.

#### IV. DESCRIPTION OF HAZARDOUS WASTES

- A EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- 3. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste (a) that will be handled which cossess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS.,.,,.,.,.,

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous westes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
  "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

and the second	A. EPA		C. UNIT	D. PROCESSES							
	HAZARD. WASTENO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	SURE (enter code)	1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in $D(1)$ )						
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X-2	D 0 0 2	400	P	T 0 3 D 8 0							
X-3	$D \mid 0 \mid 0 \mid 1 \mid$	100	P	T 0 3 D 8 0							
3	D 0 0 2				included with above						

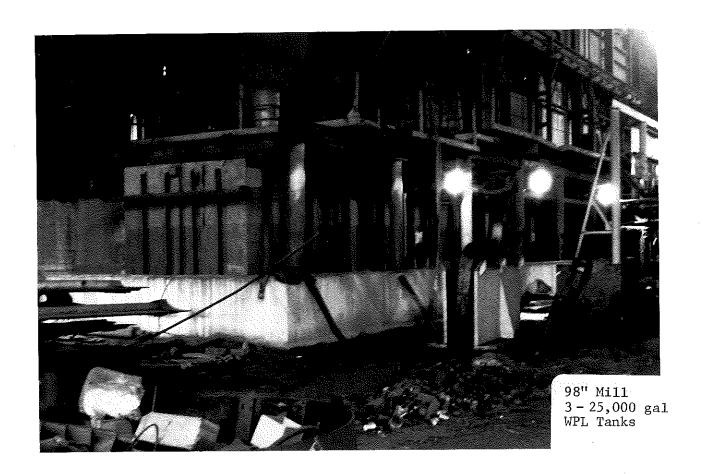
Continued from page 2.

NOTE: Photocopy this page before completing - ou have more than 26 wastes to list.

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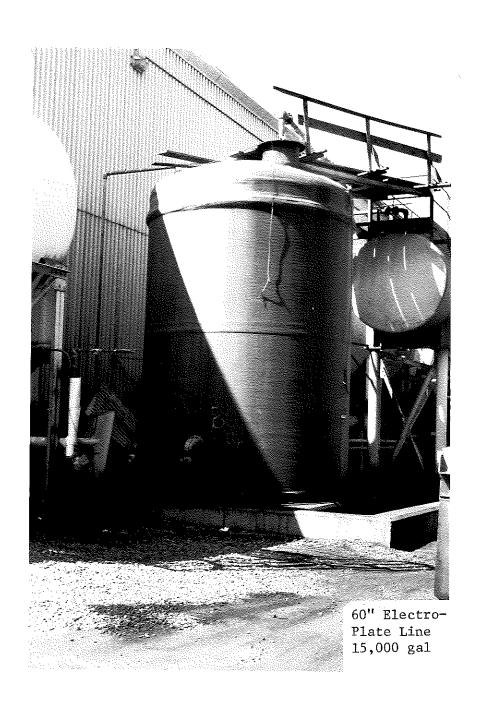
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IV. DESCRIPTION OF HAZA	RDOUS WASTES, Int	inued)	to the second second second second second second second second second second second second second second second			
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FOHD004218	6 7 3 7/4 6					
V. FACILITY DRAWING	72 11 11 11					
All existing facilities must includ	e in the space provided on p	age 5 a scale drawin	g of the facility (see instruction	ons for more d	etaill.	
VI. PHOTOGRAPHS						
All existing facilities must in	clude photographs <i>(aeria</i>	l or ground—leve	// that clearly delineate all	existing stru	ctures; exist	ing storage,
treatment and disposal areas		ige, treatment or	disposal areas (see instruct	tions for mot	e detail).	
VII. FACILITY GEOGRAPH			LONGITI	IDE (degrees, )	ninutes & sec	onds)
LATITUDE (d	legrees, minutes, & seconds)			8 1 4	0 0 5 N	[
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VIII, FACILITY OWNER						
A. If the facility owner is a	lso the facility operator as li	sted in Section VIII	on Form 1, "General Informa	ation", place a	n "X" in the i	oox to the left and
skip to Section IX belov	√.		· n			Ē
B. If the facility owner is n	ot the facility operator as lis	ted in Section VIII	on Form 1, complete the following	lowing items:		
	1. NAME OF FACIL	TY'S LEGAL OW	· · · · · · · · · · · · · · · · · · ·	<del></del>	2. PHONE	NO. (area code & no.)
<u>.e.</u>						
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3. STREST C	OR P.O. BOX		4. CITY OR TOWN	5.	ST.	6. ZIP CODE
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IX. OWNER CERTIFICATI  I certify under penalty of law		vamined and am	familiar with the informa	tion submitt	ed in this an	d all attacned
documents and that based of	n my inquiry of those in	dividuals immedi	ately responsible for obtai	ining the info	ormation, I t	elieve that the
submitted information is tru	e, accurate, and complet	e. I am aware tha	t there are significant pena	alties for sub	mitting false	information,
including the possibility of f	ine and imprisonment.			· · · · · · · · · · · · · · · · · · ·		
A. NAME (print or type)	Vice President	B. SIGNATURE			C. DATE SIGI	÷ 4.€.D
W. G. Wiley, Jr.	Flat Rolled	MIKK	JUSY. I		41201	96 C.
X. OPERATOR CERTIFICA						
I certify under penalty of las		examined and am	familiar with the informa	tion submits	ed in this an	d all attached
documents, and that based o	nn my inquiry of those in	dividuals immedi	iately responsible for obtai	ining the info	ormation, I I	elieve that the
submitted information is tru		e. I am aware tha	t there are significant pena	alties for sub	mitting false	e information,
including the possibility of f	me and imprisonment.					
A. NAME (print or type)		B. SIGNATURE			C. DATE SIG	NED
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# ATTACHMENT 2-C Photograph (Form 3 - VI) April 1986





## ATTACHMENT 2-C Photograph (Form 3 - VI) April 1986



## ATTACHMENT 2-C Photograph (Form 3 - VI) April 1986





## ATTACHMENT 3-A

## LTV Steel Company, Inc. Cleveland (East) Works WASTE STORAGE TANKS

## April 1986

84" Pickle Line	25,000 gallon tank
(Spent Hydrochloric Acid)	25,000 gallon tank
60" Electroplate Line	15,000 gallon tank
(Spent Hydrochloric Acid)	6,000 gallon tank
Electric Repair Shop (Degreaser Sludge)	529 gallon container
TOTAL	71,529 gallons

"GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

Facility Name:

LTV Steel Company, Inc.

Facility Location:

Cleveland (East) Works

Mailing Address:

3100 East 45th Street Cleveland, OH 44127

U.S. EPA ID No.:

OHD 004 218 673

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site, in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of

April 15, 1986
(Please type, in above space: today's date, or other appropriate past date)

- 2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed, and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.
- 3. I finally certify under penalty of law that I have personally examined, and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

N.G. Wilayof

W. G. Wiley, Jr. Vice President Flat Rolled

4/24/86

Signature

Typed Name and Title

Date

(Please have appropriate official, per 40 CFR 270.11, sign and date)

### Spill Certification Statement

I certify under penalty of law that no reportable spills occurred in the area where hazardous waste was stored during the RCRA storage period. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the above statement is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

OHD 004 218 673

LTV Steel Company, Inc.
Cleveland (East) Works
Facility Name

Signature of Executive Officer

Vice President Flat Rolled LTV Steel Company, Inc.

4 24 86 Date

### LTV STEEL COMPANY, INC. CLEVELAND WORKS - EAST HAZARDOUS WASTE MANAGEMENT

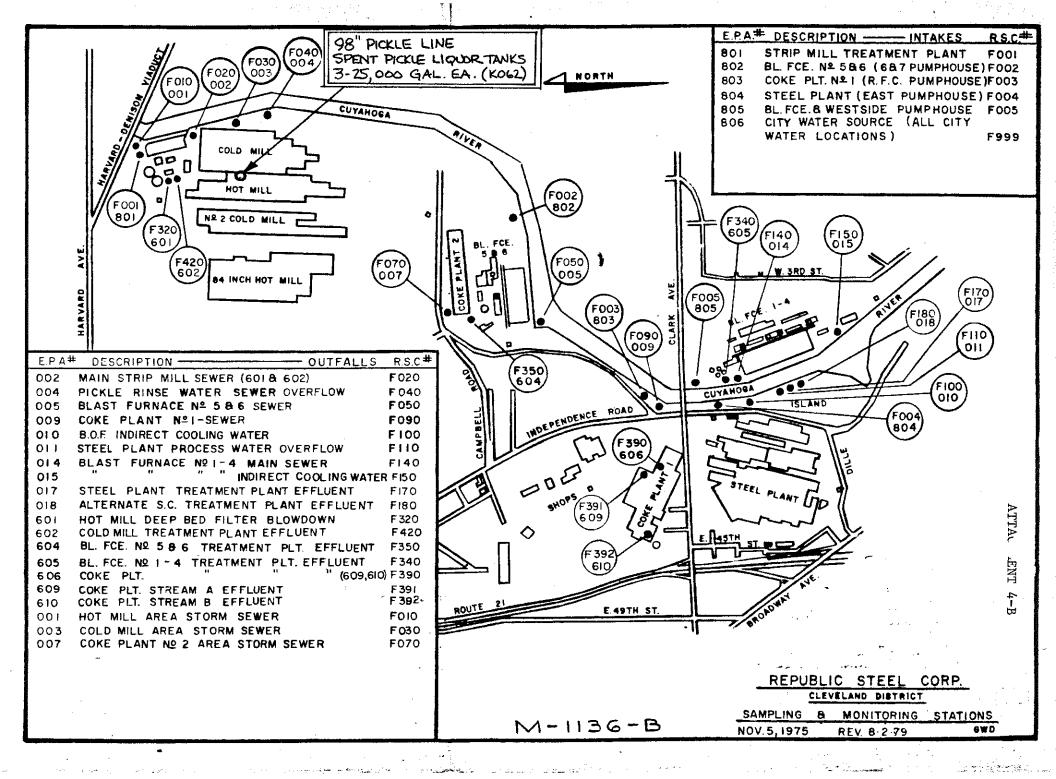
This procedure is established to ensure that no accumulation of hazardous waste occurs in the below listed storage tanks and containers for greater than 90 days.

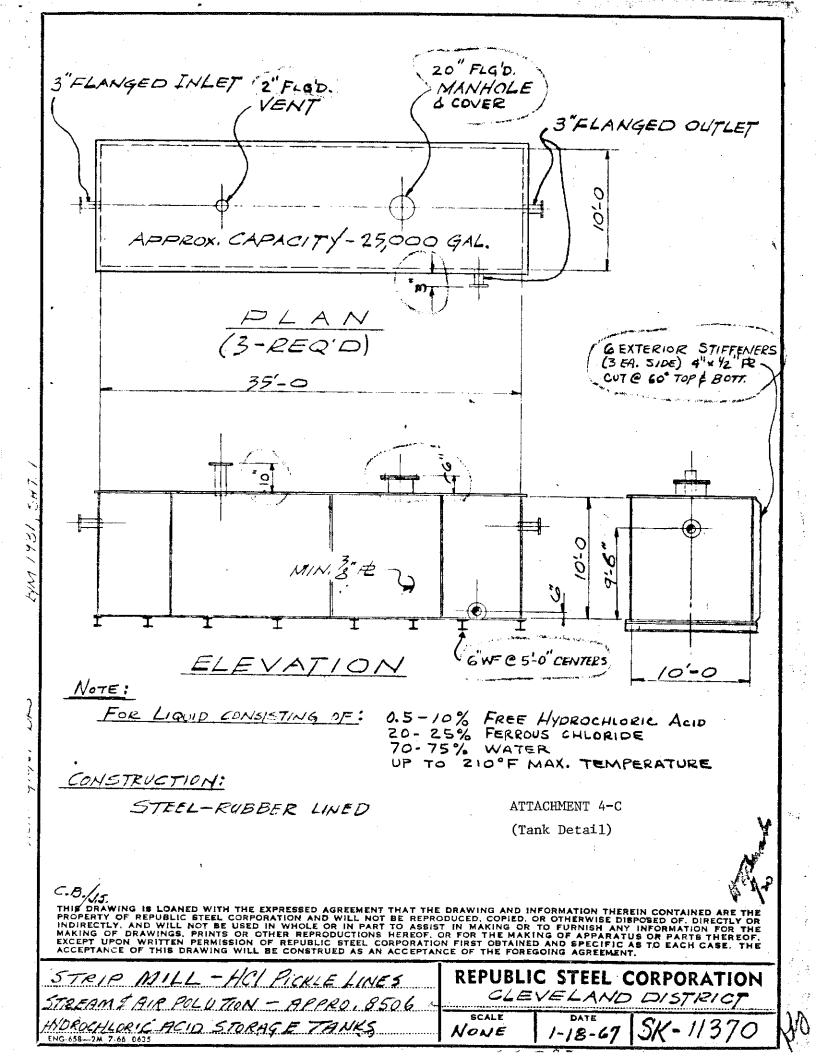
- 1. Within every 90 days, the responsible department will empty their hazardous waste storage tanks or containers.
- 2. A record of this emptying will be made in the department permanent log.
- 3. The department Superintendent will send verification of this activity to the Cleveland Works Environmental Control Department. Verification will be a copy of permanent log indicating the date this activity was performed.
- 4. Cleveland Works Environmental Control will maintain a file of the verifications. Also in this file will be copies of the procedures utilized to empty the tanks and containers.
- 5. This procedure will commence April 1, 1986.

The storage tanks and containers involved are as follows:

- 1. Waste Acid Tanks 84" Pickle Line (2 25,000 gallon)
- 2. Waste Acid Tanks 60" Electroplate Line (1 15,000 gallon) (1 6,000 gallon)
- 3. Degreaser Sludge Container Electric Repair Shop (1 529 gallon)

This procedure may be adjusted as necessary at any time.







## Certified Mail-Return Receipt Requested

U.S. EPA Region V Post Office Box A3587 Chicago, Illinois 60604

Ohio EPA Post Office Box 1049 Columbus, Ohio 43216-1049

Attn: RCRA Activities

Attn: Division of Solid and Hazardous

Waste Management

Re: LTV Steel Company, Inc.

Cleveland (East) Works

EPA I.D. No. OHD 004218673 & TR, TSD, PA

#### Gentlemen:

Pursuant to the requirements of 50 FR 49164 (November 29, 1985), LTV Steel Company, Inc. is hereby filing a subsequent notification of its burning activities under section 3010 of RCRA.

At the above referenced facility, LTV Steel Company, Inc. presently burns hazardous waste fuel (Cadence Product 312) in blast furnace(s) which are "industrial furnace(s)" under the definitions in 40 CFR 260.10. In addition, this facility also burns both specification and off-specification used oil fuels in steel plant combustion facilities which are "industrial boilers" and/or "industrial furnaces" as defined in 40 CFR Part 260.10.

LTV Steel Company, Inc. does not intend to store hazardous waste fuel (Cadence Product 312) prior to burning. Thus, this notification is for the burning of hazardous waste fuel and not a notice, prerequisite for interim status, for storage.

Should you have any questions, please contact Mr. L. A. Szuhay at 216-429-6475.

Very truly yours,

pesident Engineering

JMF/fh

1554a

#### Certification Statement

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. M. Fartley

Vice President Engineering

LTV STEEL Co., Inc.

JAN 25 1986

Date

Re: Permit Change Request

Date of Request: 7/26/82 Date of Receipt: 8/04/82

OHD004218673

Ohio Permit No. 02-18-0186

MAR 27 1995

ENVIRONMENTAL CONTROL DEPT. CLEVELAND DISTRICT

Republic Steel Attn: R. L. Nemeth 3100 E. 45th St. Cleveland, OH 44127

Dear Sir or Madam:

We are in receipt of request(s) for change to your Ohio Hazardous Waste Installation and Operation Permit. Indicated above are the date(s) of your request(s) and the date(s) we received your request(s).

Unfortunately, at the time we received your permit change request(s) there were no rules in effect that allowed either Ohio EPA or the Hazardous Waste Facility Board (HWFB) to act upon those request(s). Consequently, your permit change request(s) were never processed and your permit remains as originally issued.

However, rules are now effective which allow Ohio EPA and the Ohio Hazardous Waste Facility Board (HWFB) to process requests for permit changes. Upon receipt of a request for change, the Ohio EPA will classify the requested change into one of two categories, either a revision or a modification. Basically, a revision is a change to your facility which does not impact the siting criteria contained in Section 3734.05(C)(6) of the Ohio Revised Code such as a facility requesting authority to process or handle wastes which are similar to wastes which they are currently authorized to process or handle. Permit revisions will be processed entirely by Ohio EPA. The package to be submitted for a revision should include a new Part A form, revised as appropriate, specifications and drawings where applicable, and a letter of justification for the change.

Conversely, a modification is a change to your facility which impacts the siting criteria contained in Section 3734.05(C)(6) of the Ohio Revised Code. e.g., a facility which requests authority to conduct regulated activities different from those previously authorized by the permit. Requests classified as modifications will be reviewed by Ohio EPA, but the final determination will be made by the Dhio HWFB. The package for a modification request should include the applicable portions of a Part B application, (including a modified Part A form) and a letter of justification for the change. Please refer to Rule 3745-50-51(3) of the Ohio Administrative Code for further guidance on whether a permit change is a revision or a modification.

Re: Modification Request

Page Two

<u>All</u> requests for change, whether subsequently classified by Ohio EPA as modifications or revisions, should be submitted to:

Ohio EPA
Division of Solid and Hazardous Waste Management
Attn: Thomas E. Crepeau, Manager
Data Management Section
P.O. Box 1049
Columbus, Ohio 43216-1049

We are now in a position to consider your request if you wish to pursue a change to your HWFB permit. However, no action will be taken on the above-referenced modification request(s) because of the significant amount of time that has passed since these request(s) were submitted. Therefore, in order to be sure of your present intentions, we request that you resubmit an updated permit change package if you still wish to pursue a change to your permit.

If you do not wish to pursue a change of your original permit, you need not resubmit at this time. In any case, if we do not hear from you we will assume that you no longer desire a change to your permit at this time, and any previous requests of this nature will be voided.

If you have further questions concerning changes to your hazardous waste permit, please contact Bolaji Dosunmu at (614) 462-8388.

Sincerely.

Steven H. White, Chief

Division of Solid and Hazardous Waste Management

SW/ds

cc: D.O.

11187

## Republicateel

Republic Steel Corporation General Offices: Republic Building Environmental Control PO Box 6778 Cleveland OH 44101

TRS. TSD. PA

July 26, 1982

JUL 2 9 1982

WASTE MANAGEMENT BRANCH EPA, REGION V

WL West Director WB Tucker Jr. Assistant to the Director CM Brown Assistant Director-Air

Waste Management Branch Air & Hazardous Materials Division U.S. EPA - Region V 230 S. Dearborn St. Chicago, Illinois 60604

Subject: Revised Part A Permit Application

Republic Steel Cleveland District - OHD004218673 💪 .

A revised Part A permit application describing the hazardous waste storage activities performed at the Republic Steel Cleveland District facility, located in Cleveland, Ohio is attached. This permit application updates the activities described in the Part A permit application dated November 17, 1980. No facilities are being expanded or replaced. The revised Part A reflects regulatory and operational changes that have occurred since the original Part A was filed.

A copy of this revised permit application is being sent to Ohio EPA.

Please contact this office concerning questions about the content of the permit application (216/622-5916).

Sincerely,

D. M. Gubanc

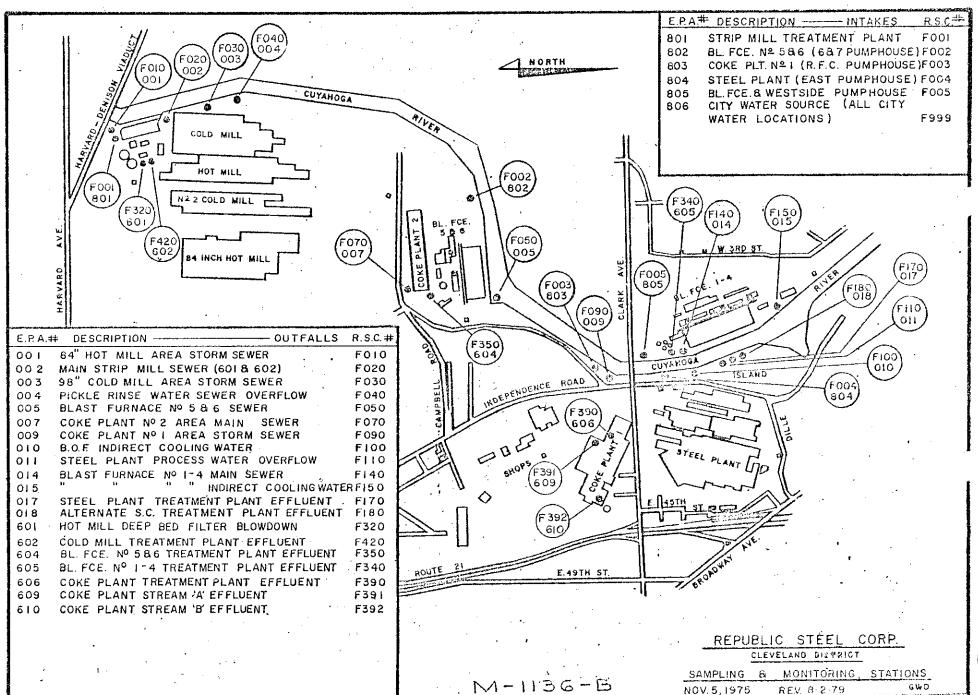
Sr. Solid Waste Management Engineer

DMG:nf

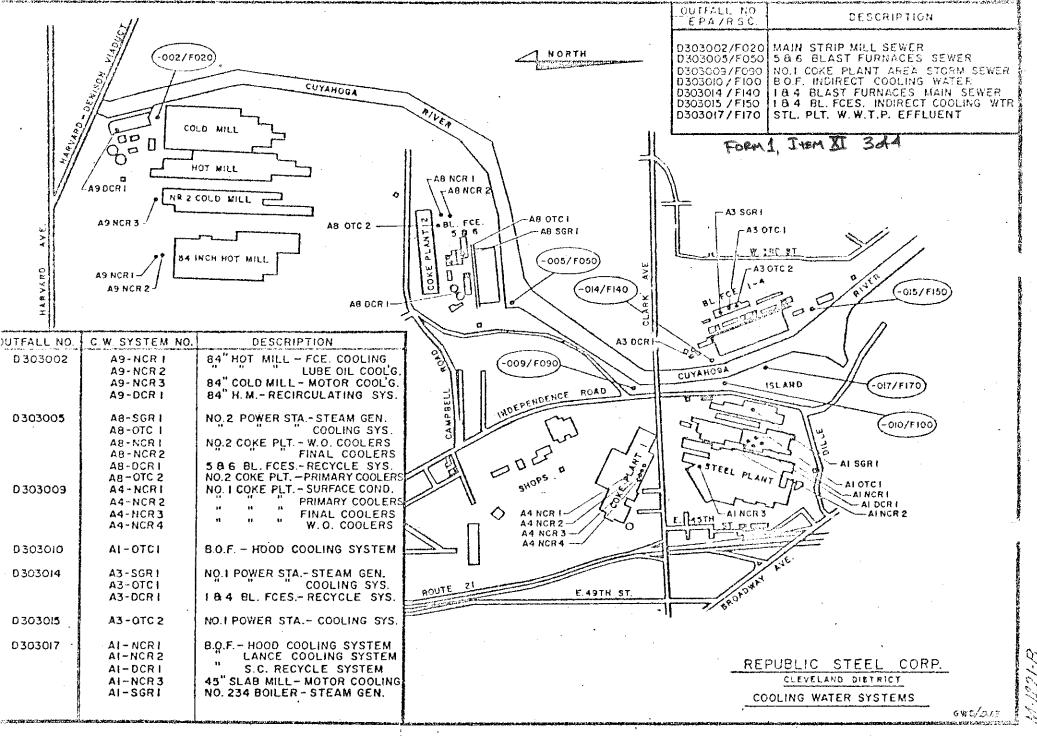
cc: Chief, Division of Hazardous Materials Management - Ohio EPA - w/att.

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	ERAL INFORM		I. EPA I.D. NUMBER	III F/AIC
GENERAL (Read the "	onsolidated Permits P General Instructions'	rogram	F O H D O O 4 2 ]	8 6 7 3 D
I. EPA I.D. NUMBER  III. FACILITY NAME  V. MAILING ADDRESS  PLEASE PL	ACE LABEL IN	THIS SPACE	If a preprinted label has it in the designated space, ation carefully; if any of through it and enter the appropriate fill—in area be the preprinted data is absolute of the label space if that should appear), pleas proper fill—in area(s) belicomplete and correct, you	seen provided, affix Review the informatis incorrect, cross correct data in the low. Also, if any of ent (the area to the sts the information e provide it in the low. If the label is need not complete
VI. FACILITY LOCATION	Items I, III, V, and VI must be completed regentitems if no label has been the instructions for detailors and for the legal a which this data is collected.	dless). Complete all provided. Refer to alled item descriputhorizations under		
II. POLLUTANT CHARACTERISTICS				San San San San San San San San San San
INSTRUCTIONS: Complete A through J to determine v questions, you must submit this form and the supplement if the supplemental form is attached. If you answer "no" is excluded from permit requirements; see Section C of the	tal form listed in the to each question, y instructions. See als	e parenthesis following the qu ou need not submit any of th o, Section D of the instruction	estion. Mark "X" in the box in ese forms. You may answer "no ns for definitions of bold—face	the third column o" if your activity it terms.
	YES NO ATTACHED		QUESTIONS	YES NO FORM
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		include a concentrated	r (either existing or proposed) animal feeding operation or ion facility which results in a le U.S.? (FORM 2B)	X 19 20 21
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		D. Is this a proposed faciliin A or B above) which waters of the U.S.? (FOI	ty <i>(other than those described</i> h will result in a discharge to RM 2D)	X Z5 26 27
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X X	municipal effluent belo taining, within one qu	ect at this facility industrial or w the lowermost stratum con- parter mile of the well bore, drinking water? (FORM 4)	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas pro- duction, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		cial processes such as r process, solution minin	ct at this facility fluids for spe- nining of sulfur by the Frasch g of minerals, in situ combus- ecovery of geothermal energy?	
<ol> <li>Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the in- structions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</li> </ol>	X	NOT one of the 28 inc instructions and which per year of any air pollu	sed stationary source which is dustrial categories listed in the will potentially emit 250 tons stant regulated under the Clean or be located in an attainment	X
III. NAME OF FACILITY	40 41 42	en en en en en en en en en en en en en e		43   44   45
SKIP REPUBLIC STEEL	, C, L, E, V, E, L	, A, N, D, , D, I, S, T,	R I. C. T.	69
IV. FACILITY CONTACT				The Control of the Control
A. NAME & TITLE (last, fi	I R CON	T. R. O. L 2.	B. PHONE (area code & no.)  1. 6 6. 2. 2 6.3.7.0	
V. FACILITY MAILING ADDRESS	<b>"你我来</b> 这么么你?	45 46	- 41   49 - 51   152 - 51	
A. STREET OR P.O.	BOX RFFT			
B. CITY OR TOWN	111111	C.STATE D. ZIP CO	DDE	
4 C L E V E L A N D		0.H 4.4.1.	2, 7	
VI. FACILITY LOCATION	加州 医格里氏	2 2 2 2		
A. STREET, ROUTE NO. OR OTHER	R E E T	ER		
18 16		45		
C.U.Y.A.H.O.GA				
C. CITY OR TOWN		D.STATE E. ZIP C	DE F. COUNTY CODE	A THE PLAN STREET
6 C.L.E.V.E.L.A.N.D.		0 H 4 4 1	2 7	
EPA Form 3510-1 (5-80)		24 1 1 47 47	1 32 - 34	

ONTINUED FROM THE FRONT				
/II. SIC CODES (4-digit, in order of priority)				
A. FIRST		I (m /a )	B. SECOND	<b>"</b> "是一个美观。
3,3,1,2 (specify) INTEGRATED STEEL PLANT	7	(specify)		*
C. THIRD			D. FOURTH	
(specify)	7	(specify)		
III. OPERATOR INFORMATION	15 16	19		A CONTRACTOR OF THE STREET
A. NAM	ME TO THE TOTAL PROPERTY.			B. Is the name listed
				owner?
REPUBLIC STEEL CORPO	R, A, T, I, O, N,			YES NC
C. STATUS OF OPERATOR (Enter the appropriate letter into	the answer box; if "Oth	er", specify.)	D. PHONE	area code & no.)
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE 0 = OTHER (specify)	P (specify)		A 2 1 6 6	2 2 5 0 0 0
P = PRIVATE  E. STREET OR P.O. BOX	36		15 10 10	- 21)   22 - 25
0 B 0 X 6 7 7 8				
F. CITY OR TOWN	G.ST	TE H. ZIP CODE	IX, INDIAN LAND	
ACT EVEL AND		H 4 4 1 0	Is the facility located	on Indian lands?
CLEVELAND		4	☐ YES	□NO
16	40 41	62 47 - 51		
EXISTING ENVIRONMENTAL PERMITS  A. NPDES (Discharges to Surface Water)  D. PSD (Air I	Emissions from Propose	d Sources)		
			and the second	
N 0, H, O,		30		
	E. OTHER (specify)		ie.i	
0 8 1	- H W - 0 1, 8	3. 6	וֹסׁ HWFAB Perm	it
C. RCRA (Hazardous Wastes)	E. OTHER (specify)	30		
TT T T T T T T T T T T T T T T T T T T		1   (spec	ify)	
R 9 9 116 17 18 7 30 15 16 17 18		30		The state of the s
I. MAP				
Attach to this application a topographic map of the area extithe outline of the facility, the location of each of its existing treatment, storage, or disposal facilities, and each well when water bodies in the map area. See instructions for precise required.	ng and proposed into re it injects fluids ur	ake and discharge	structures, each of i	its hazardous waste
KII. NATURE OF BUSINESS (provide a brief description)				
Integrated Steel Plant producing plate	; zinc coated	sheets and	coil; bar pro	ducts;
hot-rolled sheet, coil and strip; cold	roffed sheets	s, corr and	strip, coke p	Iallt
by-products.				
2. F. 2 3 3 5 5 5				
DAD 3				
(III. CERTIFICATION (see instructions)				
I certify under penalty of law that I have personally examinattachments and that, based on my inquiry of those personal application, I believe that the information is true, accurate false information, including the possibility of fine and imprisonal applications.	sons immediately res and complete. I am	ponsible for obta	ining the information	on contained in the
	SIGNATURE	1	C.	DATE SIGNED
P. N. Wigton, Vice President Steel Operations	PMA	inton		1/3/1/82
COMMENTS FOR OFFICIAL USE ONLY				10010
C 15 16				55

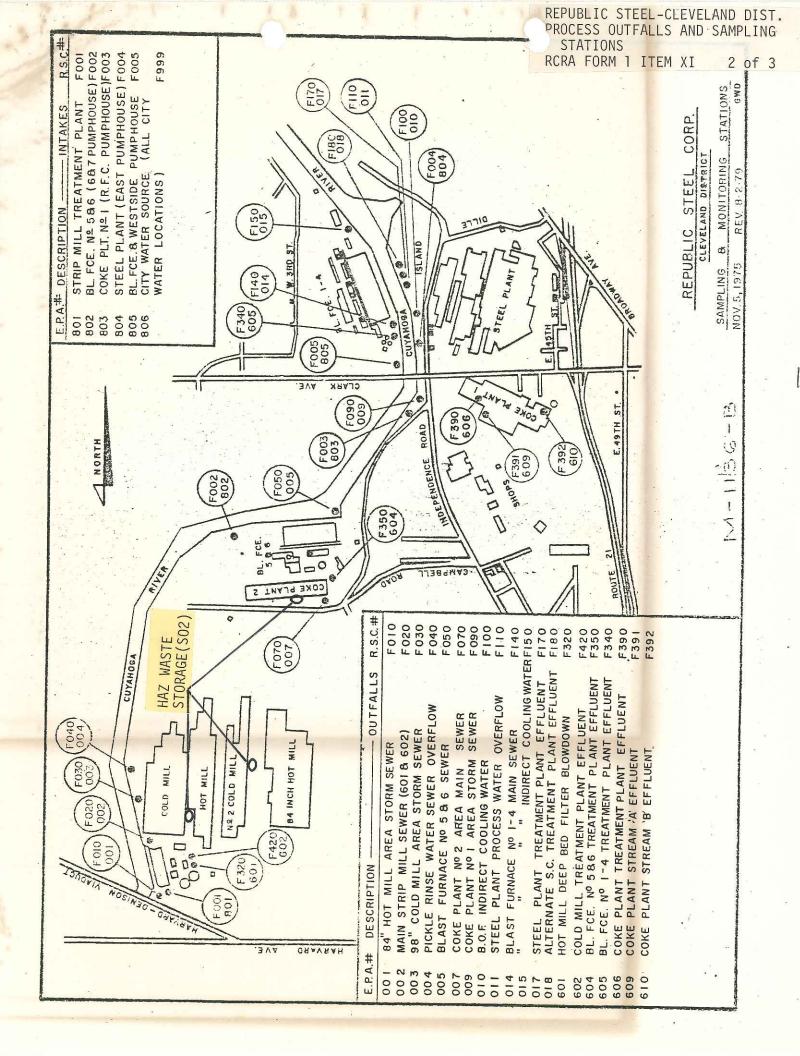


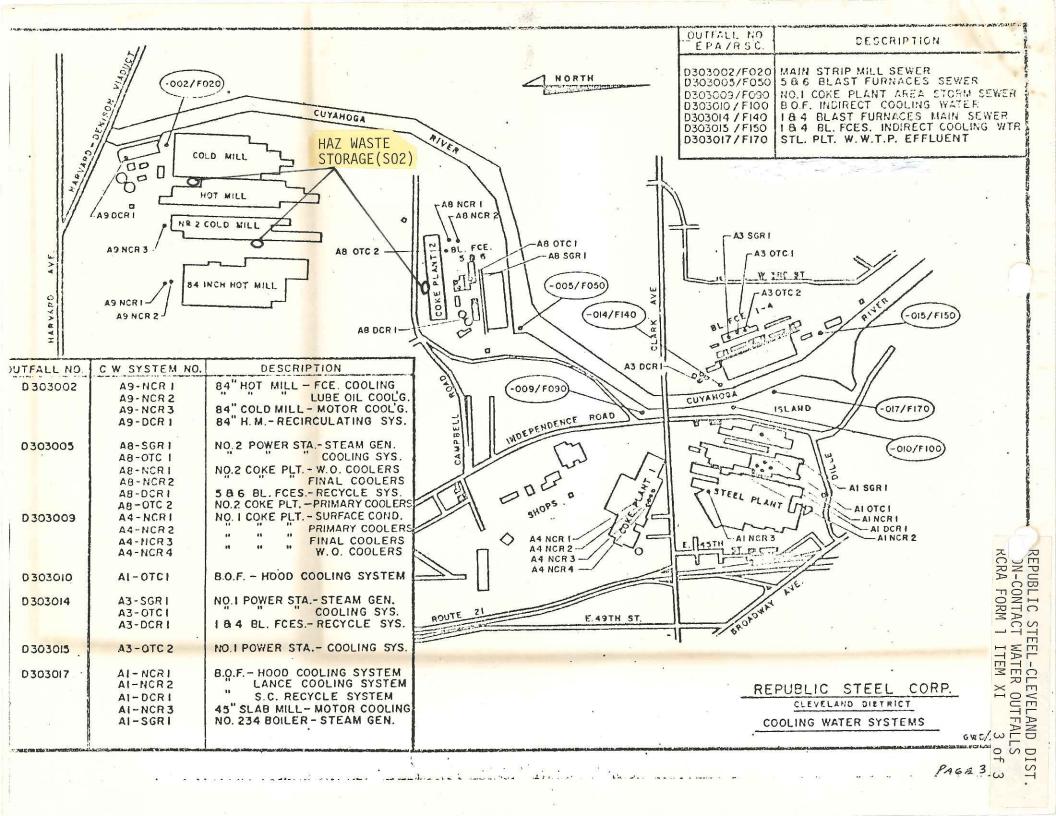
PAGE 2

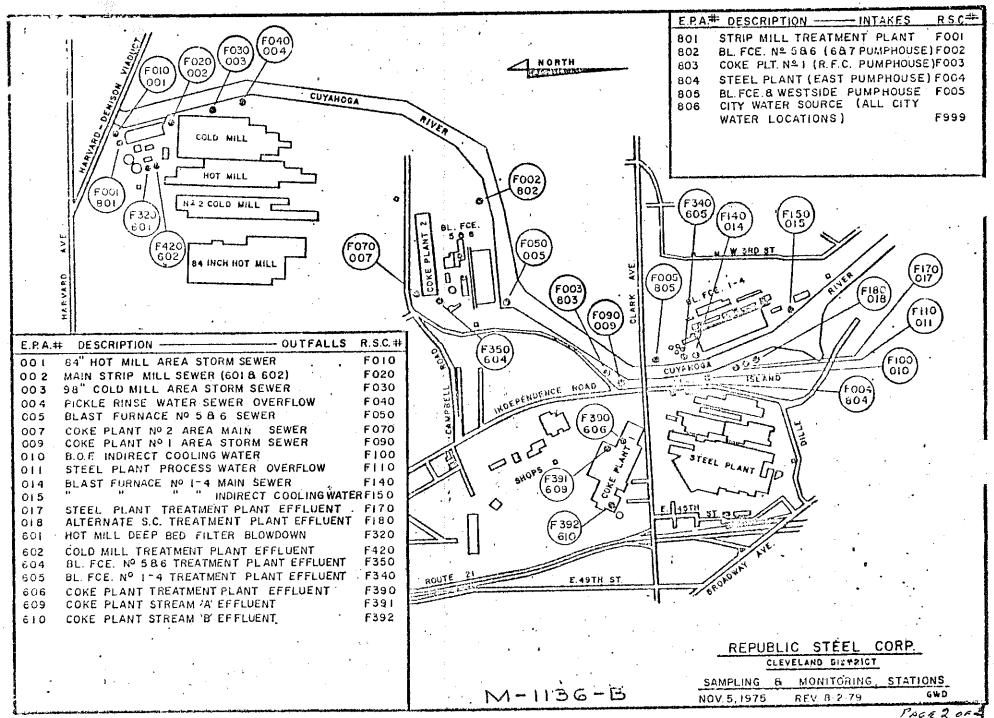


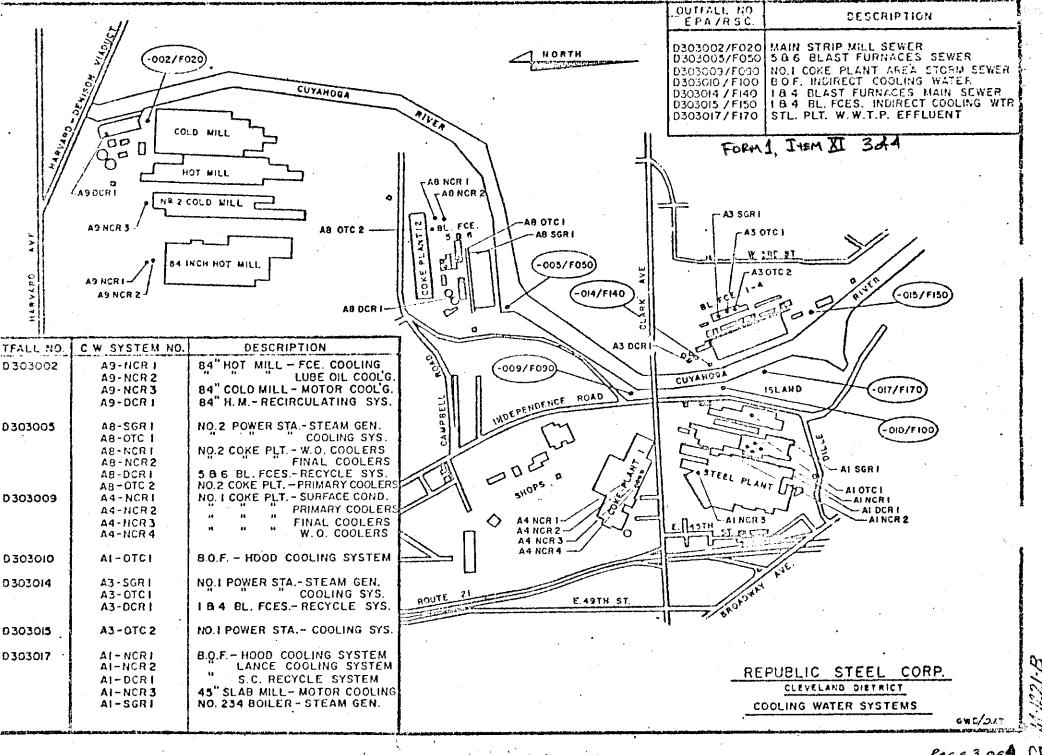
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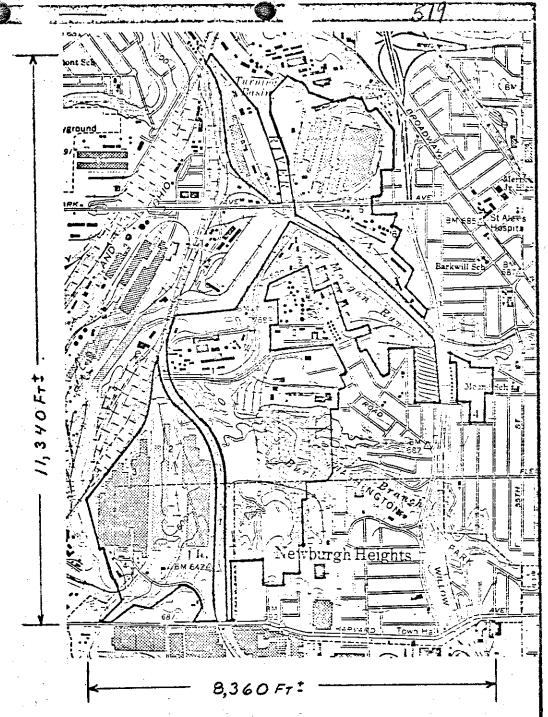








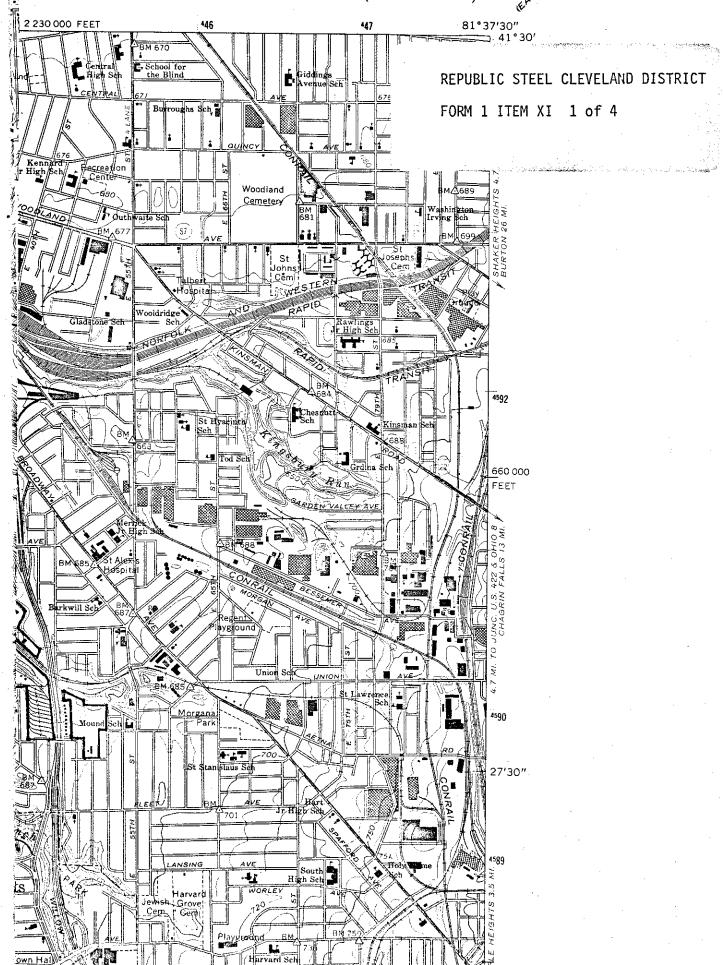
PAGE 3 OF



- 1 SLUDGE MILL 11'x33'=
- 2 84" PICHLER SPENT PICHLE LIQUOR TANKS AREA 19'x 82' :
- 3 98° PICHLER SPENT PICHLE LIQUOR TANKS AREA 23'x 125°:
- 4 PICHLE RINSE WATER NEUTRALIZATION & OXIDATION TANN ARRA 68'X19':
- 5 COME OVER GAS DESUBERRIZATION;
  \*\* DISPOSAL SUMP 12'X 9' 3'
  \*\* DRUM STORAGE AREA 21' X 9' 3
- 6 CONE PLANT WATER TREATMENT PLANT 182' X 135' I

· RAPUBLIC STIAL CLAURIDAD. DISTRICT
FORM 1 Item 81 4014

OHIO-CUYAHOGA CO
7.5 MINUTE SERIES (TOPOGRAPHIC)



Please or ht or type in the unshaded areas on fill—in areas are spaced for elite type, i.e., I		<i>)</i> .				orm Approved OMB No.	158-RO	175	519
FORM	The Control of the Co			. •	CTION AGENCY	(FEPA I.D. NUMBER			
SEPA SEPA	Co	nsolida	ted /	Permits P		F 0 H D 0 0 4 2	L 8 (	5 7	3 0
I. EPA I.D. NUMBER  JII. FACILITY NAME	PLEASE PLA	ACE I	LAE	BELIN	THIS SPACE	If a preprinted label has it in the designated space ation carefully; if any of through it and enter the appropriate fill—in area be the preprinted data is absoleft of the label space I that should appear), plea proper fill—in area(s) be complete and correct, you ltems I, III, V, and VI must be completed regaritems if no label has been the instructions for detions and for the legal which this data is collected	been p Revier it is in correction. A ent (this ists the e provious. If I need (excep dless). I provious ailed authori	rovide with the correct data are are information of the correct of	ed, affix informact, cross a in the if any of a to the comation of the label is complete B which plete all Refer to descripers under
questions, you must submit this form and if the supplemental form is attached. If y is excluded from permit requirements; see	d the supplement you answer "no"	tai form to eac	n list :h qu	ted in the estion, y	e parenthesis following the quo ou need not submit any of the	estion. Mark "X" in the box in ese forms. You may answer "n	the that's	ird co	olumn 🗟
SPECIFIC QUESTIONS	Section C of the	M	ARK			QUESTIONS	YES	MAR	K 'X'
A. Is this facility a publicly owned to which results in a discharge to wate (FORM 2A)			X	TTAGHED	B. Does or will this facility include a concentrated aquatic animal producti	(either existing or proposed) animal feeding operation or on facility which results in a		Х	ATTACHE
C. is this a facility which currently resu to waters of the U.S. other than the		I I	17	<b>18</b>		e U.S.? (FORM 2B) y <i>(other than those described</i> ) will result in a <b>discharge</b> to		20 X	21
A or B above? (FORM 2C)  E. Does or will this facility treat, store hazardous wastes? (FORM 3)	e, or dispose of	Х	23	χ	municipal effluent below taining, within one qu	RM 2D)  ct at this facility industrial or  w the lowermost stratum con- arter mile of the well bore drinking water? (FORM 4)		<u> 26-</u> Х	27
G. Do you or will you inject at this facili- water or other fluids which are broug in connection with conventional oil or duction, inject fluids used for enhan oil or natural gas, or inject fluids for hydrocarbons? (FORM 4)	ht to the surface natural gas pro- ced recovery of		Х Х	30	H. Do you or will you injectial processes such as in process, solution mining	at at this facility fluids for spenining of sulfur by the Frasch g of minerals, in situ combus covery of geothermal energy		X X	33
I. Is this facility a proposed stationary one of the 28 industrial categories structions and which will potentially per year of any air pollutant regu Clean Air Act and may affect or b attainment area? (FORM 5)	listed in the in- emit 100 tons lated under the		χ		NOT one of the 28 inc instructions and which per year of any air pollu	ed stationary source which is fustrial categories listed in the will potentially emit 250 tone tant regulated under the Clear or be located in an attainment		Х	45
III. NAME OF FACILITY	TEEL				ANDDISTE			44	
IV. FACILITY CONTACT							69		
2 A, G, U, I, E, R, L, S, U, P	& TITLE (last, fin	1 R	itle)	C O N	TROL 2	1 6 6 2 2 6 3 7	0 -		
V. FACILITY MAILING ADDRESS		48			A) 45	48   49 - 51   52	3 1		
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8. CITY C 4 C. L. E. V. E. L. A. N. D	OR TOWN	1 1	1 ;		C.STATE D. ZIP CO	2 7		nie Sylvanie	
VI. FACILITY LOCATION  A. STREET, ROUTE N	O. OR OTHER S	PECIF	ic ii	DENTIFI	ER		<b>t</b>		
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CUYAHOGA			1 1	1 1	70	OF   F. COUNTY CODE		-	
6 C. L. E. V. E. L. A. N. D.	TOWN	1 1	· 3 T	1 1	0 H 4 4 1	2 7			
EPA Form 3510-1 (6-80)		~			40   41 42   47 -	51 32 - 54 CON	INUE	ON F	REVERS

CONTINUED FROM THE FRONT VII. SIC CODES (4-digit, in order of priority)		A Comment
A. FIRST	History Constitution of the	B. SECOND
3 3 1 2 (specify) INTEGRATED STEEL PLANT	(specify)	
C. THIRD		D. FOURTH
(specify)	7 (specify)	
16 - 19	15 16 - 19	
III. OPERATOR INFORMATION		B. Is the name listed in
		Item VIII-A also the owner?
REPUBLIC STEEL CORPOR	A I I U N	YES NO
C. STATUS OF OPERATOR (Enter the appropriate letter into the	answer box; if "Other", specify.)	D. PHONE (area code & no.)
S=STATE U=UTHER (specify)	P (specify)	A 2 1 6 6 2 2 5 0 0 0
E. STREET OR P.O. BOX	en de la companya de la companya de la companya de la companya de la companya de la companya de la companya de	
0, B,0,X, 6,7,7,8, , , , , , , ,	· · · · · · · · · · · · · · · · · · ·	
F, CITY OR TOWN	G.STATE H. ZIP CODE	IX. INDIAN LAND
CLEVELAND	O H 4 4 1 0	Is the facility located on Indian lands?  YES NO
16	40 41 42 47 - 91	52
A. NPDES (Discharges to Surface Water)  D. PSD (Air Em	nissions from Proposed Sources)	
N 0 H 0 0 0 0 9 5 7 9 P		
B. UIC (Underground Injection of Fluids) E.	OTHER (specify)	
	/spec	ify)
30 15 16 17 18 - 30 15 16 17 18	30	· · · · · · · · · · · · · · · · · · ·
C. RCRA (Hazardous Wastes) E.	OTHER (specify)	ify)
R 9 9	) spec	
(I, MAP)	The displacement of the state of the second	
Attach to this application a topographic map of the area extend the outline of the facility, the location of each of its existing treatment, storage, or disposal facilities, and each well where water bodies in the map area. See instructions for precise require	and proposed intake and discharge it injects fluids underground. Inclu	structures, each of its hazardous waste
XII. NATURE OF BUSINESS (provide a brief description)		and the second second second second
Integrated Steel Plant producing plate;	zinc coated sheets and	coil; bar products;
hot-rolled sheet, coil and strip; cold	rolled sheets, coil and	strip; coke plant
by-products		
XIII. CERTIFICATION (see instructions)	<b>"</b> """"",""","",""。""。""。""。""。""。""。""。""。""。""。""。""。"	为46. 对方是16. 45. 45. 46. 46. 46. 46. 46. 46. 46. 46. 46. 46
I certify under penalty of law that I have personally examined attachments and that, based on my inquiry of those person application, I believe that the information is true, accurate at false information, including the possibility of fine and imprison	ns immediately responsible for obta nd complete. I am aware that there	ining the information contained in the
in the second se	IGNATURE	C. DATE SIGNED
P. N. WIGTON, Vice President	smoh . +	
Steel Operations	· / · · · · · · · · · · · · · · · · · ·	111-17-80
COMMENTS FOR OFFICIAL USE ONLY	1 1 1 1 1 1 1 1 1 1	
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VIII. OPERATOR INFORMATION	extension to the state of	showing the first	Server in the se		B. Is the name listed
	A. NAME	<del> </del>	<del></del>	1 1 1 1	Item VIII-A also
REPUBLIC STEEL C	URPORAT	ION			X YES N
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C. STATUS OF OPERATOR (Enter the approprie	ate letter into the answe	er box; if "Other", sp	ecify.)	D. PHONE (a	rea code & no.)
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X. EXISTING ENVIRONMENTAL PERMITS	D. PSD (Air Emission				
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C. BCRA (Hazardous Wastes)	· · · · · · · · · · · · · · · · · · ·	ER (specify)			
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XI. MAP					
Attach to this application a topographic map of	the area extending	to at least one mile	e beyond proper	ty bounderies. Th	ne map must show
the outline of the facility, the location of each treatment, storage, or disposal facilities, and each	or its existing and ich well where it ini	proposed intake at ects fluids underg	round. Include a	all springs, rivers	and other surface
water bodies in the map area. See instructions for	r precise requiremen	nts.			
XII. NATURE OF BUSINESS (provide a brief description			THE STATE OF		en la la la la la la la la la la la la la
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BY	DATE	231181	THE	ERED BOARD'S	JOURNAL
XIII. CERTIFICATION (see instructions)	Market Colored	and the second	CONTRACTOR OF THE PARTY OF THE	The second	SELENATION OF THE
I certify under penalty of law that I have pers		dam familiae with	the information	submitted in this	anniesting and a
attachments and that, based on my inquiry	onally examined and of those persons im	ram rammar with i imediately respons	ible for obtainir	sounniced in ans	s application and a on contained in th
application, I believe that the information is t	true, accurate and co	omplete. I am awa	re that there are	significant pena	alties for submittin
false information, including the possibility of f	ine and imprisonmer	nt.		-	<u></u>
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNA	TURE		c.	DATE SIGNED
P. N. WIGTON, Vice President	حييات	mol.		ļ	
Steel Operation	s 1)	11111 1	of the		1-17-8
COMMENTS FOR OFFICIAL USE ONLY	<b>海州州市市村村村</b>	A SALES SOUTH	2012年12日	AND THE PARTY OF	
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FPA Form 3510-1 (6-80) REVERSE	• —				

II. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE

- INCLUDE DESIGN CAPACITY.

ACCURATE COPY OF THE OFFICIAL DOCUMENT AS FILED IN THE RECORDS OF THE OHIO HAZARDOUS WASTE FACILITY APPROVAL BUARD

MAZARADOUS WASTE FACILITY
APPROVAL BOARD

DEC 28 1981

ENTERED BOARD'S JOURNAL

IV. DESCRIPTION OF HAZARDOUS WASTES	
A ERA HAZARDOUS WASTE NUMBER - Foter the	tour-digit number from 40 CER Supposet D for each listed basedous waste you will hancie It

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will nancia. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that weste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column 8 enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE	CODE
POUNDSP	KILOGRAMS	K
TONS:	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes; For each gharacteristic or toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Item III, to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(W, and (3) Enter in the space provided on page 4, the line number and the additional code/s/.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

				QUANTITY OF WASTE			TINU		D. PROCESSES													
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V. D	ES	CR	LIP'	TIC	ON OF HAZARDOUS WASTE		<i>cont</i> i		ed)			The second resident	D. PROCESSES		
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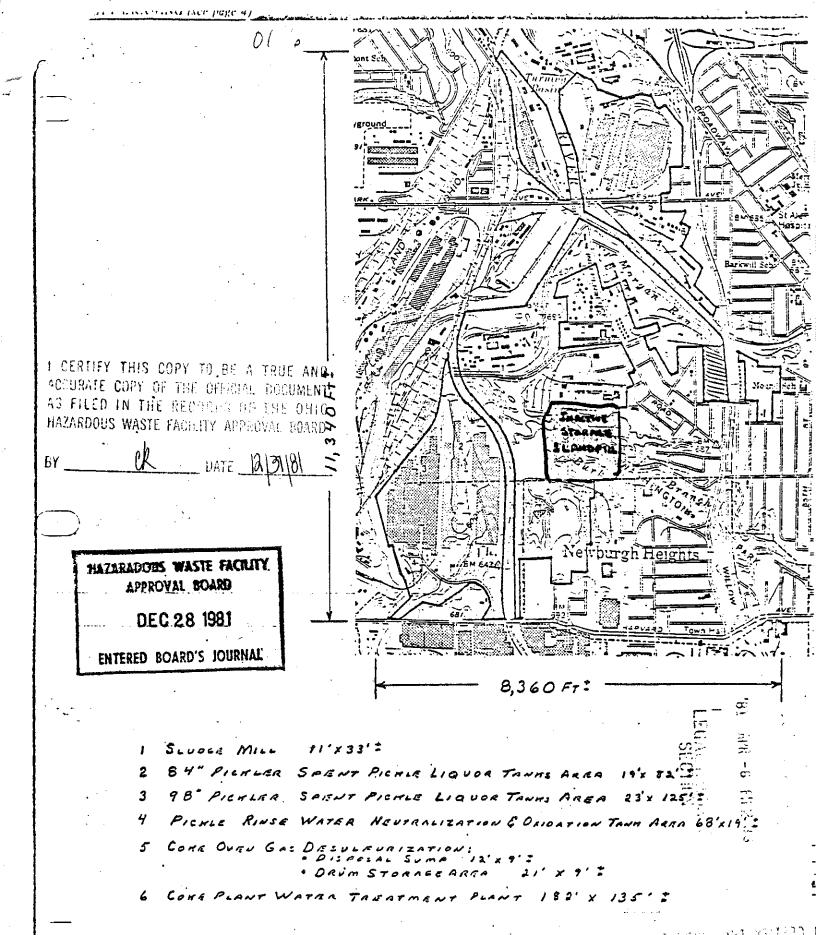
EPA Form 3510-3 (6-80)

. DESCRIPTION OF HAZARDOUS WASTES	continued)	WATER COLORS OF THE SAME	APPLICATION OF THE PARTY OF THE		460
E. USE THIS SPACE TO LIST ADDITIONAL PR	OCESS CODES FR	OM ITEM D(I) ON PAGE	E 3.		
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V. FACILITY DRAWING	ENGLISH CONTRACTOR				
All existing facilities must include in the space provided o	n page 5 a scale drawin	ig of the facility <i>(see instructio</i>	ons for more detail).		
All existing facilities must include photographs (ae	rial or ground—leve	I that clearly delineate all	avietina et piete		<b>芝薯</b>
treatment and disposal areas; and sites of future sto	Jayo, Deatment or	disposal areas (see instruct	tions for more de	es; existing storage, tail).	
LATITUDE (degrees, minutes, & second				Seattle Consider	
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VIII. FACILITY OWNER	enerale de la compa			<u>ប់ប្់</u> វ	
A. If the facility owner is also the facility operator as skip to Section IX below.	listed in Section VIII	on Form 1, "General Informa	tion", place an "X"	in the box to the left and	
				The state of the late of the	•
B. If the facility owner is not the facility operator as			owing items:		ļ
1. NAME OF FACI	LITY'S LEGAL OWN	ER	2.	PHONE NO. (area code &	no.)
119			33 34		
3. STREET OR P.O. BOX	5	4. CITY OR TOWN	5. ST.	6. ZIP CODE	
W OWNER CERTIFICATION	G   12   16		49 41 43		
IX. OWNER CERTIFICATION		interior contemporary		in the same street, and	
certify under penalty of law that I have personally documents, and that based on my inquiry of those is submitted information is true, accurate, and comple including the possibility of fine and imprisonment.	rexamined and am individuals immedia nete. I am aware that	amiliar with the informat tely responsible for obtain there are significant penal	ion submitted in t ping the informati ties for submittin	this and all attached on, I believe that the g false information,	
P. N. WIGTON, Vice President Steel Operations	B. SIGNATURE	1	C. DAT	ESIGNED	
C. OPERATOR CERTIFICATION		rustan	11-	17-80	- [
certify under penalty of law that I have personally	examined and am f	amiliar with the info		Flackon Carlos	9-24
documents, and that based on my inquiry of those in ubmitted information is true, accurate, and comple neluding the possibility of fine and imprisonment.	ndividuals immedia te. I am aware that	tely responsible for obtain there are significant penal	on submitted in t ing the informati ties for submittin	nis and all attached on, I believe that the r g false information,	
A. NAME (print or type)	8. SIGNATURE		C. DAT	ESIGNED	
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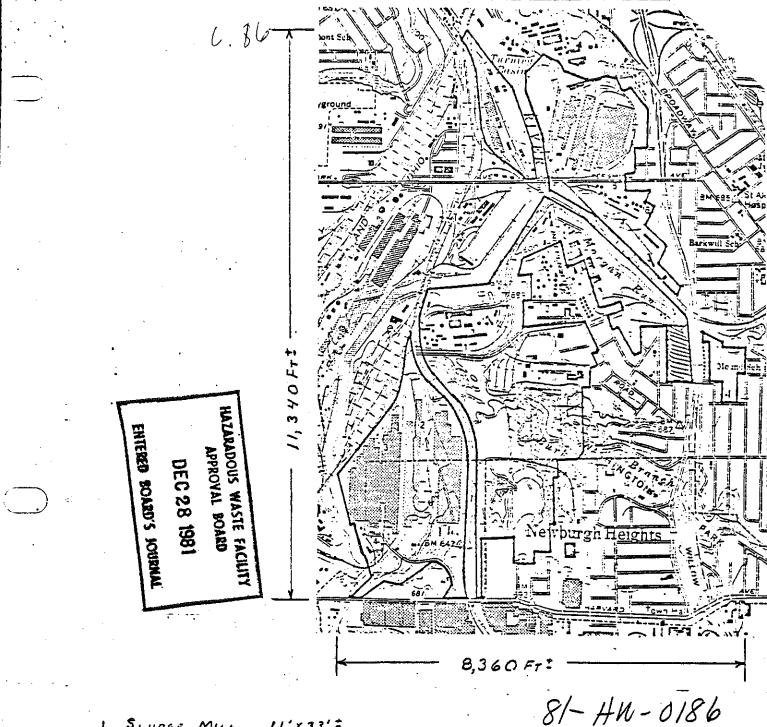
PAGE 4 OF 5

CONTINUE ON PAGE 5

Continued from the front,					
IV. DESCRIPTION OF HAZARDOUS WASTES	tinued)			11 W 11 8 1	
E. USE THIS SPACE TO LIST ADDITIONAL PR	CESS COD	ES FROM ITEM D	(1) ON PAGE 3.		
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V. FACILITY DRAWING  All existing facilities must include in the space provided of	- 150 × 150	a drawing of the facil	iny (see instructions	for more detail)	45
VI. PHOTOGRAPHS	on page 5 a scal	e drawing of the facil	ity isee instructions	Tor more detail).	
All existing facilities must include photographs (a	erial or groun	d—level) that clear	ly delineate all ex	isting structures; ex	cisting storage,
treatment and disposal areas; and sites of future s	torage, treatn	nent or disposal are	as (see instructio	ns for more detail).	
VII. FACILITY GEOGRAPHIC LOCATION  LATITUDE (degrees, minutes, & secon	ide)		LONGITUDI	E (degrees, minutes, &	seconds)
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VIII. FACILITY OWNER					
A. If the facility owner is also the facility operator skip to Section IX below.	as listed in Sec	tion VIII on Form 1,	"General Information	on", place an "X" in the	ne box to the left and
B. If the facility owner is not the facility operator :	e listed in Sect	ion VIII on Form 1	complete the follow	vina items:	
					NE NO. (area code & no.)
1. NAME OF FA	CILITY'S LEG	ALOWNER	A COMMENT OF STREET	2. PAO	NE NO. (area code & no.)
E 15 16				55 56 - 58	59 - 61 62 - 65
3. STREET OR P.O. BOX		4. CITY	OR TOWN	5.ST.	6. ZIP CODE
F	Ğ				
IX. OWNER CERTIFICATION	45 15	16 		40   41   42	17 - 11 l
I certify under penalty of law that I have persona	lly examined	and am familiar wi	ith the informatio	on submitted in this	and all attached
documents and that based on my inquiry of thos	e individuals	immediately respon	nsible for obtaini	ng the information,	I believe that the
submitted information is true, accurate, and com- including the possibility of fine and imprisonmen	piete. I am av t.	vare that there are .	signinicant penant	ies for submitting ra	alse unormation,
A. NAME (print or type)	B. SIGNA	TURE		C. DATE S	IGNED
P. N. WIGTON, Vice President	-	so of	-		
Steel Operations	1);	a.m	a lun	1/- (	7-80
X, OPERATOR CERTIFICATION					
I certify under penalty of law that I have persona documents, and that based on my inquiry of thos	lly examined se individuals	' and am familiar w immediately respo	ith the informationsible for obtaini	on submitted in this ing the information,	and all attached I believe that the
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FORMS ITEM I (PAGE 10F1



SLUDGE MILL 11'x33'=

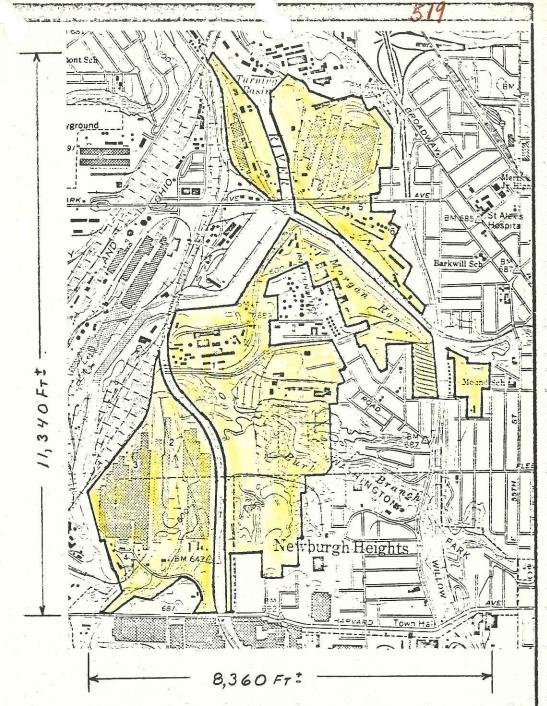
- 84" PICHLER SPENT PICHLE LIQUOR TANKS AREA 14'x 82' I
- 98° PICHLER SPENT PICHLE LIQUOR TANKS AREA 23'x 125":
- PICHLE RINSE WATER NEUTRALIZATION & OXIDATION TANN ARRA 68'x19':

I CERTIEY THIS COPY TO BE A TRUE AND ACCURATE COPY OF THE OFFICIAL DOCUMENTUOLIC STIER CLIENTEND. DISTRICT AS FILED IN THE RECORDS OF THE OHIOFORM 1 Item & 4 of 4 HAZARDOUS WASTE FACILITY APPROVAL BOARD

BY EPA Form 33 JUS (3 30)



V PACILITY DRAWING free page 4



- 1 SLUDGE MILL 11'x 33' =
- 2 84" PICHLER SPENT PICHLE LIQUOR TANKS AREA 19'x 82' 3
- 3 98" PICHLER SPENT PICHLE LIQUOR TANKS AREA 23'x 125':
- 4 PICHLE RINSE WATER NEUTRALIZATION & OXIDATION TANN AREA 68'x19' :
- 5 COHE OVEN GAS DESULFURIZATION:
  DISPOSAL SUMP 12'X 9' =

   DRUM STORAGE AREA 21' X 9' =
- 6 CONE PLANT WATER TREATMENT PLANT 182' X 135' \$

· REPUBLIC STERL CLEURIAND. DISTRICT

FORM 1 Item X 4 of 4

PAGE 4 OF 4



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### **REGION 5**

## 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

27 JUN 1988

REPLY TO THE ATTENTION OF: 5HS-13

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

L. Aguier Superintendent Environmental Control LTV Steel Company 3100 E. 45th Street Cleveland, Ohio 44127

> RE: Part B Post-Closure Permit Application LTV Steel Company OHD 004218673

Dear Mr. Aguier:

According to our records, your facility is subject to the interim status requirements under Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) as a hazardous waste management facility. Specifically, our records indicate that you submitted a closure plan for your hazardous waste management unit(s), involving closure as a landfill, for approval by the United States Environmental Protection Agency (U.S. EPA). All regulations referred to below are from 40 Code of Federal Regulations (40 CFR).

Any owner/operator of a hazardous waste disposal unit that closes after January 26, 1983, without obtaining a RCRA permit, is required by §270.1(c) to have a permit for any applicable post-closure care period. The facility is responsible for complying with the interim status post-closure requirements of §265.117 through §265.120. In addition, per §264.90(a), as modified by RCRA Section 3005(i), a land disposal unit that receives hazardous waste after July 26, 1982, is a regulated unit and is subject to Part 264 post-closure requirements, including Subpart F, which addresses groundwater protection.

Under the authority of §270.10(e)(4), this is a formal request for submittal of Part B of the permit application for the above-referenced facility, covering specifically the post-closure requirements. If you submitted a Part B application prior to your decision to close the regulated units, then you may revise your Part B application to meet the post-closure requirements rather than the operating standards.

40 CFR §270.14(a) establishes the information requirements for a RCRA Part B permit. However, because of the inherent differences between an operating permit and a permit covering only post-closure activities, some application requirements in §270.14 are not applicable for a post-closure permit. Your facility is required to submit information in the Part B application that is relevant to post-closure care activities. Although informational requirements may be dependent upon site-specific conditions, at a minimum, it should include:

- ° A copy of the post-closure inspection schedule [§270.14(b)(5)];
- ° Floodplain information [§270.14(b)(11)(iii iv)];
- o A copy of the post-closure plan [§270.14(b)(13)];
- ° Documentation of the notice in deed or an appropriate alternative instrument  $[\S270.14(b)(14)]$ ;
- ° Cost estimate for post-closure and post-closure financial mechanism [§270.14(b)(16)];
- ° A copy of the State financial instrument, if appropriate [§270.14(b)(18)];
- ° Groundwater data and information demonstrating compliance with requirements for detection monitoring, compliance monitoring and corrective action, as applicable [§270.14(c)];
- o Information on solid waste management units and releases from those units [§264.101];
- ° Financial responsibility for corrective action (if applicable); and
- $^{\circ}$  For landfills and surface impoundments, exposure information [§270.10(j)].

As stated above, this list represents the minimum information that needs to be included in the permit application. In some cases, further information may be needed depending on the nature of the facility, waste characteristics and other factors. Please refer to the enclosed RCRA post-closure permit application checklist to help you in preparing a comprehensive and complete permit application. Should you have any questions or concerns in preparing the application, please contact Mr. Robert Swale of my staff, at (312) 886-6591.

Please be reminded that submission of the permit application must be made by November 8, 1988. Upon completion of the application, please send two copies to the U.S. EPA and three copies to the Ohio Environmental Protection Agency.

Please number each page of the application uniquely, including all attachments (maps, specifications, etc.). A certification statement identical to the one stated in 40 CFR §270.11(d) must accompany each application and all additional submittals. Send two copies of the application to the following address:

RCRA ACTIVITIES
Post-Closure Permit Application
U.S. EPA, Region V
Post Office Box A-3587
Chicago, Illinois 60604

Send three copies to:

Thomas Crepeau

Ohio Environmental Protection Agency

Division of Solid & Hazardous Waste Management

Post Office Box 1049

Columbus, Ohio 43266-1049

The U.S. EPA looks forward to working with you toward fulfilling the above request. Again, should you have any questions concerning the above matter, please contact us for assistance.

Sincerely.

William E. Muno

Acting Associate Division Director

Office of RCRA

Enclosure: RCRA Post-Closure Permt Application Checklist

cc: Paul Flannigan, OEPA

Wm. E. Muno

District Office Manager, OEPA

Ed Lim, OEPA

## LTV Steel Company

file Cleveland Erst

July 7, 1988

LIV

Ohio Environmental Protection Agency Division of Solid and Hazardous Waste Management 1800 WaterMark Drive Columbus, Ohio 43266-0149

Attn: Mr. Thomas Crepeau

DSHWM

Re: LTV Steel Company, Inc.

Cleveland (East)

OHD 004218673 (Permit 02-18-0186)

Permit Change Request

Dear Mr. Crepeau:

Pursuant to rule 3745-50-51 of the Ohio Administrative Code, LTV Steel hereby requests a permit change request to revise the permit for the subject facility. Specifically, LTV Steel requests that the tank storage unit (SU2) used in the recycling of tar decanter sludge be deleted from the existing permit.

The following is a description of the recycling activity:

LTV Steel operates coke plants at its Cleveland Works-East. Each coke plant collects tar decanter sludge (KO87) in dumpsters placed on concrete pads directly under the tar decanters. The dumpsters, properly labeled and inspected, are emptied daily into what is called the Coal Tar Sludge Mill Tank (SO2 unit). The Coal Tar Sludge Mill Tank is simply a concrete tank which feeds the fluid sludge through a rotary mill onto the belt feeding coal to the coke ovens. The tar decanter sludge is thus recycled directly back to the coke ovens.

The recycling of tar decanter sludge through the coke ovens is consistent with RCRA regulation at 40 CFR 261.2(e)(1)(iii) and the corresponding Ohio regulation at 3745-51-02(E)(1)(c). This regulation identifies materials that are not solid wastes when recycled by being:

- 1. Returned to the original process from which they are generated without first being reclaimed. There are no residues generated in this recycling process. All of the material is recycled; therefore, there is no reclamation. The material is returned directly back to the coke ovens. The primary or original process can be described as the coke ovens.
- 2. The material must be returned as a substitute for raw material

  feedstock. The material is a substitute for the raw material (coal) in
  the generation of coke, and is returned in the same "stream" as that
  material. Furthermore, only a small percentage of the total raw material
  stream will be recycled material.

3. The process must use raw materials as principal feedstock. "Secondary materials" are not used to generate coke. Primary raw materials are used as the principal feedstock to produce coke.

The preamble to the January 4, 1985 promulgation for recycling requirements specifies that "sham recycling" applies to the recycling of "secondary materials used to make new products or used as a substitute for commercial products." LTV Steel has, therefore, applied the following sham recycling indicators (50 FR 638) to the subject process:

- 1. The activity is not recycling but surrogate disposal. The materials recycled are chemically identical to the materials needed and currently used in the production of coke. These are not surrogate materials or surrogate disposal.
- 2. Used in excess of the amount necessary for operating a process. There is no excess use; all recycled materials will be effective in producing a useful product.
- 3. The materials are not as effective as what they are replacing. Both the tar materials and carbon materials from the recycled secondary materials will be as effective as the materials from the original process.
- 4. Absence of records regarding the recycling transaction. Specific records are maintained for each gallon of secondary material recycled.
- 5. Not handled in a manner consistent with use as raw materials. The materials are returned to the coke batteries. There are no materials "lost" to the environment.

When recycled, coke and coal tar from the iron and steel industry is not subject to regulation under Parts 262 through 266 or Part 270 per 40 CFR 261.6(a)(3)(vii) (and analogous Ohio Regulations).

Since the recycling activity involves materials that are not solid wastes, LTV Steel respectfully requests that the tank unit (SO2) used for the recycling of tar decanter sludge be deleted from the RCRA permit.

Finally, note that Ohio EPA reviewed the recycling of KO87 at the LTV Steel Company, Inc. Warren Plant, and approved a similar recycling plan in a letter dated September 9, 1986. I trust that this information is sufficient for evaluation of the tar decanter sludge recycling activities at the Cleveland East plant.

Should you have any questions or require anything additional, please contact

Sincerely,

Manager-Solid and Hazardous Waste

Environmental Control

LAS/fh
Enclosure
cc: (next page)

cc: Ms. Francine Norling
U.S. EPA Region V, Chicago

Mr. Kris Coder Ohio EPA, NEDO

Mr. Ed Lim Ohio EPA, Columbus

4155a

LTV Steel Company Cleveland (OH) Works OHD 004218673 Permit 02-18-0186

#### Certification Statement

I certify under penalty of law that the Cleveland Works' tar decanter sludge tank storage unit (SO2) has been used for recycling activity since November 17, 1980. Based upon my inquiry of the person or persons who manage the facility, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

W. G. Wiley, Jr.

Vice President-Flat Rolled & Bar Products

Date

July 6, 1988

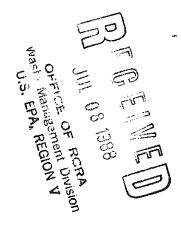
U.S. Environmental Protection Agency Region V 230 S. Dearborn Street Chicago, Illinois 60604

Attn: Mr. William E. Muno, 5 HS-13

Re: LTV Steel Company

Cleveland Works - East

OHD 004218673



Dear Mr. Muno:

This letter is in response to your Request for Part B Post-Closure Permit Application dated June 27, 1988 and confirms the telephone conversations with Mr. Robert Swale and Ms. Francine Norling of your staff.

LTV Steel has never owned or operated a RCRA land disposal unit at the above referenced facility. In fact, the only RCRA units existing at Cleveland Works-East (OHD 004218673) are storage tanks (S02) and a storage container (S01).

Please contact me if you have any questions or require anything additional.

Sincerely,

L. A. Szuhay

Manager-Solid and Hazardous Waste

Environmental Control

LAS/fh

Attachment

cc: Ms. Francine Norling /
U.S. EPA Region V, Chicago

Mr. Ed Lim Ohio EPA, Columbus

4152a



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### **REGION 5**

# 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

27 JUN 1988

reply to the attention of: 5HS-13

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

L. Aguier
Superintendent Environmental Control
LTV Steel Company
3100 E. 45th Street
Cleveland, Ohio 44127

RE: Part B Post-Closure Permit Application LTV Steel Company OHD 004218673

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JUN 3 0 1988

ENVIRONMENTAL CONTROL

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Acting Associate Division Director

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